

The Compliance-Centered Policy Failure Model (CCPFM): A Diagnostic Framework for Structural, Cognitive, and Instructional Risk in Municipal Police Policy Systems

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Abstract

Municipal police agencies often maintain extensive Directive systems designed to demonstrate legal compliance, satisfy accreditation expectations, manage liability exposure, and document administrative control. Yet recurring operational failures continue in agencies that possess written policies, digital policy platforms, electronic acknowledgment records, training files, and accreditation proofs. This paper introduces the Compliance Centered Policy Failure Model (CCPFM), a system level diagnostic and explanatory framework for identifying how legacy municipal police policy systems fail when they are designed primarily as compliance documentation systems rather than human centered legal decision systems. Building on the integrated findings of the supporting mechanism papers and the prior synthesis paper, the CCPFM argues that policy architecture, decentralized fragmentation, linguistic instability, passive dissemination, weak supervisory control, digital completion tracking, and Policy Cognitive Load operate as interacting causal variables that degrade comprehension, destabilize decision making, weaken policy fidelity, and produce inconsistent Directive application under operational conditions. The model further holds that these failures persist because compliance centered validation frameworks often assess policy presence, standards conformity, and administrative completion rather than operational coherence, cognitive usability, comprehension reliability, supervisory reinforcement, and corrective feedback. The paper operationalizes the CCPFM into diagnostic domains, observable indicators, and a proposed risk scoring framework for evaluating legacy municipal police policy systems. These domains include policy architecture, structural fragmentation, linguistic decision signals, Policy Cognitive Load, instructional implementation, supervisory control, digital implementation, and corrective feedback. The model does not claim that policy architecture alone explains police failure, excuses individual misconduct, or establishes municipal liability. Rather, it establishes policy system design as a measurable organizational risk variable capable of shaping interpretation, training transfer, supervision, implementation fidelity, and constitutional risk. The paper concludes that municipal police policy modernization requires more than periodic revision, digital distribution, or accreditation mapping. It requires diagnostic evaluation and architectural replacement of compliance centered policy systems with coherent, cognitively usable, legally grounded, training integrated, supervision connected, digitally supported, and feedback driven Directive systems.

I. INTRODUCTION

Municipal police agencies increasingly operate inside dense Directive systems designed to demonstrate legal compliance, satisfy accreditation expectations, manage civil liability exposure, regulate Officer conduct, and document administrative control. Modern policy systems often include extensive manuals, electronic distribution records, acknowledgment logs, accreditation proofs, digital policy platforms, training files, review cycles, and archived versions. These systems create substantial evidence that the agency has written, distributed, stored, and maintained formal guidance. Yet recurring operational failures continue in agencies that possess such systems. This recurring pattern suggests that the central problem is not simply the absence of policy. The deeper problem is that many legacy policy systems are built to prove compliance while failing to function as human centered legal decision systems.

The prior synthesis paper, Compliance Centered Police Policy Systems, established the integrative foundation for this claim. That paper argued that municipal police policy failure often emerges when agencies design, evaluate, and maintain Directives as compliance documents while relying on them operationally as instructional decision systems. In that mismatch, structurally fragmented Directives, unstable obligation language, excessive cognitive load, passive dissemination, weak comprehension validation, inadequate supervisory reinforcement, and digitized completion records interact to degrade policy fidelity and produce inconsistent Directive application under operational conditions (Bremer, 2026c). The present paper builds on that synthesis, but it performs a different function. The synthesis paper demonstrated that the mechanisms interact. This paper formalizes those interactions into a diagnostic and explanatory model.

The Compliance Centered Policy Failure Model, or CCPFM, is introduced here as a system level framework for identifying, measuring, and evaluating structural, cognitive, linguistic, instructional, supervisory, digital, and legal risk within municipal police policy systems. The model is premised on a simple but consequential distinction: a police agency may possess an extensive policy system and still lack a functioning decision system. A policy may exist, be acknowledged, satisfy a standard, appear in a digital platform, and remain legally defensible when read alone, while still failing to guide Officers and Supervisors through lawful decision making under stress. The CCPFM therefore shifts the evaluative question from whether an agency has Directives to whether the Directive system is coherent, cognitively usable, trained, understood, supervised, corrected, digitally supported, and revised when warning signs appear.

The central thesis of this paper is that legacy municipal police policy systems designed primarily for legal, accreditation, and administrative compliance rather than instructional coherence operate as structurally coupled and cognitively misaligned failure systems. Within those systems, policy architecture, decentralized fragmentation, linguistic instability, passive dissemination, weak supervision, digital completion tracking, and Policy Cognitive Load function as interacting causal variables. They amplify interpretive instability, implementation drift, degraded recognition primed decision making, weakened policy fidelity, and elevated organizational and constitutional risk. This is not a claim that policy architecture alone explains police failure. Culture, leadership, training quality, supervision, resources, discipline, local politics, and individual conduct all remain important. The claim is narrower: policy system design is a measurable organizational risk variable that can independently shape how law is translated into field action.

The need for a diagnostic model arises because conventional policy review often evaluates surface indicators. A reviewer may ask whether a Directive exists, whether it is legally current,

whether it contains required accreditation language, whether personnel acknowledged it, or whether it appears in the agency's digital policy platform. Those questions are necessary, but they are incomplete. They do not determine whether related Directives operate coherently, whether obligation language communicates stable decision signals, whether the Directive can be retrieved under stress, whether personnel understood the rule, whether Supervisors have clear review duties, whether warning signs trigger correction, or whether digital records prove implementation rather than completion. The CCPFM is designed to fill that evaluative gap.

The first foundation of the model is Instructional Systems Failure Theory. That theory holds that municipal police policy systems often fail because they are designed and maintained as compliance artifacts while being used operationally as human centered instructional decision systems. It identifies policy architecture as an independent causal variable and Policy Cognitive Load as a mediating mechanism through which fragmented, ambiguous, overly complex, cross referenced, and poorly integrated Directives increase interpretive inconsistency, implementation drift, and degraded discretionary performance (Bremer, 2025a). The CCPFM adopts that theoretical foundation and converts it into diagnostic categories.

The second foundation is structural fragmentation. Fragmented Policy Systems argued that decentralized, multi author police policy development creates predictable fragmentation through redundancy, contradiction, drift, layering, and misalignment (Bremer, 2024a). The importance of this mechanism is that fragmentation exists at the level of architecture, not merely writing style. A single Directive may appear complete when reviewed alone while the policy system becomes unstable when related Directives are read together. Public administration scholarship supports this distinction by separating coordination, coherence, and integration as related but analytically distinct conditions (Cejudo & Michel, 2017; Trein et al., 2019). The CCPFM treats fragmentation as one of the core measurable domains of policy system risk.

The third foundation is linguistic decision signal failure. From Language to Action argued that modal verbs in police Directives function as decision triggers, communicating obligation, discretion, and expected practice (Bremer, 2024b). Legal drafting and interpretation scholarship similarly recognizes that mandatory and permissive language can carry substantive interpretive consequences (Office of the Federal Register, 2017; Scalia & Garner, 2012; Tiersma, 1999). In a police Directive, must, may, and should are not interchangeable. They shape whether an Officer understands an action as required, prohibited, permitted, or expected. The CCPFM therefore treats modal instability, undefined qualifiers, inconsistent terminology, and unclear responsibility language as observable indicators of linguistic risk.

The fourth foundation is Policy Cognitive Load. Cognitive Load in Police Policy argued that policy complexity, ambiguity, structural inconsistency, information density, and redundancy impose cognitive demands that may exceed working memory limits under operational conditions (Bremer, 2025b). Cognitive Load Theory establishes that working memory is limited when processing novel or interacting information, and that poor instructional design increases extraneous load (Paas et al., 2003; Sweller, 1988; Sweller et al., 1998). Recognition primed decision making research further shows that personnel under time pressure rely on accessible schemas and recognizable cues rather than slow analytical reconstruction (Klein, 1998, 2008). The CCPFM therefore treats cognitive usability as a diagnostic domain, not an optional writing preference.

The fifth foundation is instructional implementation. Policy Without Comprehension argued that passive dissemination, including email distribution, electronic acknowledgment, policy portal posting, and learning management completion, verifies exposure without proving

comprehension, retention, retrieval, or operational application (Bremer, 2025c). Learning science supports that claim because retrieval practice, distributed practice, and practice testing strengthen durable recall more effectively than passive review (Dunlosky et al., 2013; Roediger & Karpicke, 2006). Training evaluation literature also distinguishes between delivery, learning, behavior, and results (Arthur et al., 2003; Baldwin & Ford, 1988; Kirkpatrick & Kirkpatrick, 2006). The CCPFM therefore evaluates whether the agency's implementation system proves operational understanding or merely records administrative exposure.

The sixth foundation is supervisory control. Legacy Police Policy Systems as Evidence of Failure to Train and Failure to Supervise Liability argued that policy systems become dangerous when they show written rules without a functioning system for training, comprehension verification, supervisory reinforcement, discipline, correction, and revision (Bremer, 2026b). Supervision is the field control layer that determines whether policy is reinforced, reviewed, documented, corrected, and escalated when patterns appear. Police accountability scholarship recognizes that supervision is central to controlling discretion and sustaining organizational accountability (Mastrofski, 2004; Walker & Archbold, 2018). The CCPFM therefore evaluates whether Directives assign meaningful supervisory duties or merely assume supervision by title.

The seventh foundation is digital implementation. Digitized Compliance argued that PowerDMS and similar digital policy systems are legally neutral but operationally consequential infrastructure. Used well, digital platforms can support version control, training alignment, comprehension checks, supervisory follow up, corrective action, and revision. Used passively, they can preserve a professional, searchable, timestamped record of assignment, acknowledgment, dashboard completion, standards mapping, and archival proof without proving meaningful implementation (Bremer, n.d.). Implementation science reinforces this distinction because adoption of a system is not the same as implementation fidelity (Durlak & DuPre, 2008; Fixsen et al., 2005; Nilsen, 2015). The CCPFM therefore examines whether digital records prove implementation or merely completion.

The eighth foundation is legal and evidentiary risk. Municipal liability doctrine does not impose liability merely because an agency has an imperfect policy system. *Monell v. Department of Social Services* (1978) requires municipal policy, custom, practice, or omission rather than respondeat superior liability. *City of Canton v. Harris* (1989) requires deliberate indifference for failure to train. *Connick v. Thompson* (2011) emphasizes the role of pattern based notice. *Board of County Commissioners v. Brown* (1997) requires rigorous proof of municipal culpability and causation. Nevertheless, policy systems may become evidence of what an agency knew, trained, supervised, corrected, or ignored when warning signs appeared (Bremer, 2026b). The CCPFM does not determine liability, but it helps identify the policy system conditions that may create operational and evidentiary vulnerability.

This paper therefore has three purposes. First, it defines the CCPFM as a formal model of compliance centered policy failure. Second, it operationalizes the model into diagnostic domains and observable indicators. Third, it proposes a structured risk scoring framework for evaluating legacy municipal police policy systems. The scoring framework is not a liability formula. It is a diagnostic tool. Its purpose is to identify where policy systems are structurally fragmented, cognitively burdensome, linguistically unstable, passively implemented, weakly supervised, digitally completion centered, or disconnected from corrective feedback.

The practical value of the CCPFM is that it converts theory into audit logic. An agency can use the model to evaluate a high liability Directive cluster, such as use of force, vehicle pursuits, search and seizure, custody, prisoner handling, body worn camera use, internal affairs,

supervisory review, or mental health response. A consultant can use it to identify where a legacy system requires architectural replacement rather than isolated editing. A Training Function can use it to identify which Directives require comprehension validation and scenario based reinforcement. An accreditation manager can use it to supplement standards mapping with coherence review. A defense expert or plaintiff expert can use it to distinguish policy presence from policy function. Command Staff can use it to prioritize risk based modernization.

The scope of the paper remains limited. The CCPFM does not claim that every Officer error is caused by policy architecture. It does not excuse misconduct. It does not replace legal analysis. It does not treat digital policy platforms as causes of constitutional harm. It does not claim that accreditation is defective. It does not claim that every policy weakness creates municipal liability. The model instead identifies policy system conditions that may increase the probability of misinterpretation, drift, inconsistent application, weak supervision, incomplete training transfer, and evidentiary exposure. It is a diagnostic framework, not a verdict.

The paper proceeds in twelve additional sections. Section II explains why a diagnostic model is needed. Section III defines the CCPFM. Section IV identifies the theoretical foundations of the model. Section V describes the core failure domains. Section VI converts those domains into diagnostic criteria and observable indicators. Section VII proposes a risk scoring framework. Section VIII explains causal pathways and interaction effects. Section IX applies the model to legacy municipal police policy systems and high liability Directive clusters. Section X addresses legal, operational, administrative, accreditation, training, and digital uses of the model. Section XI identifies the limits of the CCPFM. Section XII explains implications for policy modernization. Section XIII concludes by arguing that municipal police policy failure is not primarily a missing policy problem. It is a system design problem that can be diagnosed, measured, and corrected through structured policy architecture review.

II. THE NEED FOR A DIAGNOSTIC MODEL

A diagnostic model is necessary because legacy police policy systems are often evaluated through indicators that do not fully measure policy function. Agencies commonly review whether a Directive exists, whether it is legally current, whether it contains required standards language, whether it has been approved, whether it was distributed, whether personnel acknowledged it, and whether it appears in an accreditation or digital policy management system. Those indicators are important, but they primarily measure presence, conformity, distribution, and documentation. They do not necessarily measure whether the Directive system is coherent, cognitively usable, trained, understood, supervised, corrected, or revised after warning signs appear. The prior synthesis paper identified this as the central weakness of compliance centered policy systems: they often prove that rules exist while leaving unresolved whether those rules function as human centered legal decision guidance (Bremer, 2026c).

The need for diagnosis begins with the distinction between policy presence and policy function. Policy presence asks whether a Directive is available, approved, and documented. Policy function asks whether the Directive actually performs its operational role. A functioning Directive must translate law into action, communicate obligation clearly, reduce unnecessary interpretive burden, support training, guide supervisory review, trigger correction, and produce usable evidence of implementation. Instructional Systems Failure Theory argues that many municipal police Directives are constructed as compliance artifacts while being relied upon operationally as instructional decision systems (Bremer, 2025a). That mismatch cannot be adequately evaluated through traditional policy review alone because traditional review often asks whether

the policy says the right thing rather than whether the policy system works under field conditions.

A diagnostic model is also necessary because policy failure is interactive. Fragmentation, linguistic instability, cognitive load, passive dissemination, weak supervision, and digital completion tracking do not operate in isolation. A Directive can be legally current but structurally misaligned with related Directives. It can be well intentioned but linguistically unstable. It can be comprehensive but cognitively burdensome. It can be distributed but not understood. It can be digitally tracked but not implemented. It can be supervised in theory but not corrected in practice. The prior synthesis paper established that these conditions interact to degrade comprehension, destabilize decision making, weaken policy fidelity, and produce inconsistent Directive application (Bremer, 2026c). A diagnostic model is therefore needed because a checklist of isolated policy defects cannot capture the cumulative risk produced by interacting failures.

Structural fragmentation illustrates why ordinary review is insufficient. A policy may appear adequate when examined by itself, yet conflict with related Directives when the system is read as a whole. Fragmented Policy Systems argued that decentralized, multi author drafting produces redundancy, contradiction, drift, layering, and misalignment, while compliance frameworks may validate required policy presence without detecting relational incoherence across the Directive architecture (Bremer, 2024a). Public administration literature supports this distinction because coordination, coherence, and integration are different evaluative conditions (Cejudo & Michel, 2017; Trein et al., 2019). A diagnostic model must therefore test not only individual Directive adequacy, but cross Directive coherence.

Linguistic instability creates a second diagnostic need. Policy review often focuses on substantive content, but the CCPFM must also evaluate whether the language communicates stable decision signals. From Language to Action argued that modal verbs such as must, may, and should function as operational decision triggers that communicate obligation, discretion, and expected practice (Bremer, 2024b). Legal drafting authorities similarly recognize that mandatory and permissive terms carry interpretive consequences (Office of the Federal Register, 2017; Scalia & Garner, 2012; Tiersma, 1999). A policy may address the correct topic while still failing to communicate whether action is required, permitted, expected, or prohibited. A diagnostic model must therefore examine obligation language as a measurable policy risk variable.

Cognitive usability creates a third diagnostic need. Cognitive Load in Police Policy argued that Directives operate as cognitive input systems and that policy complexity, ambiguity, structural inconsistency, density, and redundancy can elevate cognitive load beyond working memory limits under operational conditions (Bremer, 2025b). Cognitive Load Theory explains that poorly structured instructional information increases extraneous load and interferes with comprehension, schema construction, and performance (Paas et al., 2003; Sweller, 1988; Sweller et al., 1998). This means that policy review cannot stop at legal sufficiency. A Directive may be legally accurate and still operationally difficult to process. A diagnostic model must therefore evaluate whether Directives are built for retrieval, recognition, and application under stress.

Implementation creates a fourth diagnostic need. Many agencies can prove that a Directive was sent or acknowledged but cannot prove that personnel understood it. Policy Without Comprehension argued that passive dissemination creates an evidentiary illusion of implementation because it measures exposure rather than comprehension, retention, retrieval,

or operational application (Bremer, 2025c). Retrieval practice and training evaluation research support this distinction by showing that durable learning requires active recall, practice, reinforcement, and transfer into behavior rather than passive review alone (Arthur et al., 2003; Baldwin & Ford, 1988; Dunlosky et al., 2013; Kirkpatrick & Kirkpatrick, 2006; Roediger & Karpicke, 2006). A diagnostic model must therefore distinguish policy distribution from policy implementation.

Supervision creates a fifth diagnostic need. A Directive that states Officer duties but fails to assign supervisory review, correction, escalation, documentation, and retraining duties is incomplete as an organizational control instrument. Legacy Police Policy Systems as Evidence of Failure to Train and Failure to Supervise Liability argued that policy systems become dangerous when they preserve written rules without a functioning system for training, comprehension verification, supervisory reinforcement, discipline, correction, and revision (Bremer, 2026b). Police accountability literature similarly recognizes that supervision is central to controlling discretion and maintaining organizational accountability (Mastrofski, 2004; Walker & Archbold, 2018). A diagnostic model must therefore evaluate whether the Directive system creates supervisory control or merely assumes it.

Digital implementation creates a sixth diagnostic need. Digitized Compliance argued that PowerDMS and similar systems are legally neutral but operationally consequential infrastructure that can either document disciplined implementation or amplify passive completion (Bremer, n.d.). Digital systems can show version control, training linkage, comprehension validation, Supervisor alerts, remedial assignments, and revision history. They can also show only assignment, acknowledgment, standards mapping, and dashboard completion. Implementation science reinforces the distinction between adopting a tool and implementing a practice with fidelity (Durlak & DuPre, 2008; Fixsen et al., 2005; Nilsen, 2015). A diagnostic model must therefore evaluate what the digital record proves, not merely whether a digital record exists.

The need for diagnosis is reinforced by municipal liability doctrine, but the CCPFM should not be confused with a liability test. Monell requires a municipal policy, custom, practice, or omission connected to constitutional injury, and Brown requires rigorous proof of municipal culpability and causation (*Board of County Commissioners v. Brown*, 1997; *Monell v. Department of Social Services*, 1978). City of Canton recognizes failure to train liability only when inadequate training reflects deliberate indifference, and Connick emphasizes that a pattern of similar violations is ordinarily necessary to establish notice (*City of Canton v. Harris*, 1989; *Connick v. Thompson*, 2011). The CCPFM does not decide those legal questions. It identifies policy system conditions that may create operational weakness, supervisory gaps, implementation opacity, and evidentiary vulnerability.

A diagnostic model is also needed because DOJ pattern and practice findings repeatedly reveal failures that extend beyond policy absence. Federal investigations have frequently identified problems involving policy clarity, training implementation, supervision, accountability, review systems, and corrective feedback (U.S. Department of Justice, 2014, 2015, 2016, 2017, 2023, 2024). The Philadelphia deadly force assessment similarly identified weaknesses involving policy guidance, training, supervision, and organizational learning (Fachner & Carter, 2015). These findings show that agencies may fail even when they possess written policies. What is missing is a structured method for evaluating the policy system as an interacting architecture before outside investigation, litigation, or critical incident review exposes the failure.

The CCPFM fills that gap by converting theory into evaluative structure. It does not merely ask whether the agency has a Directive. It asks whether the Directive system is architecturally

coherent, linguistically stable, cognitively usable, instructionally implemented, supervisory connected, digitally supported, feedback driven, and legally defensible as a functioning system. It creates a method for identifying whether the agency's policy system produces clarity or confusion, comprehension or exposure, supervision or assumption, implementation or completion, learning or drift.

The model is especially useful because policy weakness often hides inside apparent completeness. A legacy agency may have a large manual, recent revision dates, accreditation proofs, digital acknowledgment records, and command approval. Those features can create confidence. But they can also conceal structural incoherence, untrained revisions, inconsistent terminology, weak supervisory duties, and absent feedback loops. Systems theory explains that latent organizational weaknesses often remain hidden until they combine with operational pressure and become visible as failure (Perrow, 1984; Reason, 1990; Vaughan, 1996). The CCPFM is designed to detect those latent conditions before they become field failures.

The diagnostic need is therefore practical as well as theoretical. Command Staff need a way to prioritize modernization based on risk rather than convenience. Policy writers need a method for identifying whether Directives are coherent and usable. Training Functions need to know which Directives require comprehension validation. Supervisors need clear review and correction expectations. Accreditation managers need a way to supplement standards mapping with coherence review. Digital platform administrators need to configure systems to document implementation rather than completion. Legal advisors and expert reviewers need a structured way to distinguish policy presence from policy function.

The CCPFM therefore responds to the central weakness of legacy policy review. Traditional review often confirms that the agency has addressed a topic. The CCPFM asks whether the agency has built a working decision system. Traditional review often evaluates Directives individually. The CCPFM evaluates policy clusters and interaction effects. Traditional review often treats acknowledgment as implementation. The CCPFM treats acknowledgment as evidence of exposure only. Traditional review often treats supervision as assumed. The CCPFM evaluates whether supervisory control is designed, assigned, documented, and connected to correction. Traditional review often treats digital platforms as modernization. The CCPFM asks whether digitization supports implementation or merely timestamps passivity.

For these reasons, a diagnostic model is necessary. The failure system is complex, but it is not unknowable. It can be identified through observable indicators. It can be measured across domains. It can be scored by severity. It can be mapped across high liability policy clusters. It can be used prospectively to modernize policy systems before failure occurs and retrospectively to understand why implementation broke down. The CCPFM is designed to make policy system failure visible, diagnosable, and correctable.

III. DEFINITION OF THE COMPLIANCE CENTERED POLICY FAILURE MODEL

The Compliance Centered Policy Failure Model is a system level diagnostic and explanatory framework for evaluating how municipal police policy systems fail when they are designed primarily to prove legal, accreditation, and administrative compliance rather than to function as coherent instructional decision systems. The model treats policy failure as an emergent property of system design, not merely as isolated Officer error, incomplete training, poor drafting, or weak supervision. It is intended to identify how policy architecture, fragmentation, linguistic instability, cognitive burden, passive dissemination, supervisory weakness, digital completion tracking, and feedback failure interact to produce operational inconsistency and organizational risk.

The CCPFM begins with the premise that the proper unit of analysis is the policy system, not the individual Directive. A municipal police agency does not operate through one policy at a time. It operates through an interdependent architecture of Directives, forms, training materials, supervisory review processes, digital assignment records, accreditation proofs, internal affairs practices, reporting requirements, and corrective feedback loops. Fragmented Policy Systems established that related Directives may appear complete when reviewed separately while collectively producing structural inconsistency across the agency's policy architecture (Bremer, 2024a). The CCPFM adopts that system level view and makes it diagnostic.

Under the CCPFM, a Compliance Centered Police Policy System is a Directive architecture that prioritizes proof of rule existence, formal sufficiency, standards conformity, distribution, acknowledgment, and administrative completion, while insufficiently ensuring that Directives are coherent, cognitively usable, trained, understood, supervised, corrected, and revised as operational legal decision guidance. This definition is drawn from the prior synthesis paper, which identified the core mismatch between compliance centered design and human centered operational use (Bremer, 2026c). The CCPFM formalizes that mismatch as a diagnosable failure condition.

The model defines policy architecture as the structural organization of a policy system. Policy architecture includes the arrangement of language, definitions, sequencing, hierarchy, decision pathways, cross references, approval requirements, reporting duties, supervisory responsibilities, training links, digital workflows, review triggers, and corrective feedback mechanisms. Instructional Systems Failure Theory argued that policy architecture functions as an independent causal variable because the way a Directive system is built affects how personnel retrieve, interpret, apply, supervise, and correct policy (Bremer, 2025a). Human factors research supports this approach because system design affects usability, workload, attention, error, and performance under operational conditions (Norman, 2013; Wickens et al., 2015).

The model defines Policy Cognitive Load as the cognitive burden imposed by Directive structure, fragmentation, ambiguity, branching complexity, cross reference dependency, information density, redundancy, and policy training misalignment during interpretation, recall, and operational decision making. Cognitive Load in Police Policy identified these characteristics as load inducing variables that can degrade comprehension, disrupt schema activation, and produce inconsistent application under stress (Bremer, 2025b). Cognitive Load Theory provides the theoretical foundation for this claim because working memory is limited when processing novel or interacting information, and poorly designed instructional systems increase extraneous load (Paas et al., 2003; Sweller, 1988; Sweller et al., 1998).

The model defines policy failure as more than a violation of a written rule. Under the CCPFM, policy failure exists when the Directive system does not reliably produce coherent, retrievable, trained, supervised, and correctable legal decision guidance. This definition shifts the analysis from whether an Officer violated policy to whether the policy system was reasonably designed to support lawful action. An Officer may violate a clear, well trained, well supervised Directive through misconduct or poor judgment. That is a different problem. The CCPFM focuses on the separate condition in which the policy system itself contributes to misinterpretation, drift, incomplete comprehension, inconsistent supervision, or weak corrective action.

The CCPFM distinguishes between policy defect and policy failure. A policy defect is a discrete weakness, such as a missing definition, inconsistent modal verb, outdated legal reference,

unclear reporting trigger, or absent supervisory duty. A policy failure is broader. It occurs when defects interact across the system in ways that weaken policy fidelity. For example, a vague term may be manageable if training clarifies it and Supervisors enforce it consistently. The same vague term becomes more serious if related Directives define it differently, training does not address it, Supervisors review it inconsistently, and digital records show only acknowledgment. The model therefore emphasizes interaction effects rather than isolated defects.

The CCPFM also distinguishes between administrative completion and implementation fidelity. Administrative completion occurs when the agency can show that policy activity happened. A Directive was issued, assigned, acknowledged, mapped, stored, or archived. Implementation fidelity concerns whether the Directive was actually operationalized as intended. Implementation science supports this distinction because adoption or activity does not establish faithful execution in practice (Durlak & DuPre, 2008; Fixsen et al., 2005; Nilsen, 2015). Policy Without Comprehension applied this distinction to policing by showing that passive dissemination verifies exposure without proving comprehension, retention, retrieval, or application (Bremer, 2025c).

The model further defines policy fidelity as the degree to which field conduct, supervisory review, documentation, correction, and training reinforcement align with the intended meaning of the Directive. Policy fidelity is not established by the existence of policy language. It depends on coherent architecture, stable obligation signals, cognitive usability, training transfer, comprehension validation, supervisory control, digital implementation, and corrective feedback. When these components are weak, field practice may drift away from formal policy. Street level bureaucracy literature explains why frontline personnel adapt formal rules under practical constraints, but the CCPFM adds that policy architecture can either reduce or amplify that drift (Lipsky, 1980; Maynard-Moody & Musheno, 2003; Bremer, 2026c).

The CCPFM defines failure persistence as the process by which policy system weaknesses remain undetected because compliance centered validation frameworks measure presence rather than function. A compliance review may confirm that the agency has a policy, that a proof exists, that an acknowledgment was completed, or that a Directive is mapped to a standard. It may not test whether related Directives are coherent, whether personnel understand the rule, whether Supervisors correct drift, or whether warning signs trigger revision. The fragmentation paper identified this as the compliance coherence gap (Bremer, 2024a). The synthesis paper extended the concept to training, supervision, digital completion, and legal defensibility (Bremer, 2026c).

The CCPFM defines failure scaling as the process by which policy weaknesses expand across time, Directives, policy clusters, and agencies. Scaling may occur through repeated amendment, inherited templates, policy borrowing, accreditation examples, vendor materials, training shortcuts, digital workflow defaults, or institutional habit. Fragmented Policy Systems identified institutional reproduction as a scaling mechanism through which flawed structures can be copied or normalized (Bremer, 2024a). Instructional Systems Failure described related concepts of compliance accretion, Policy Architecture Drift, and Architectural Replication Failure (Bremer, 2025a). The CCPFM incorporates these mechanisms as explanations for why similar policy weaknesses may appear across agencies.

The model includes seven core diagnostic domains: policy architecture, structural fragmentation, linguistic decision signals, Policy Cognitive Load, instructional implementation, supervisory control, digital implementation, and corrective feedback. These domains are not merely categories for discussion. They are intended to be measured through observable

indicators. Policy architecture can be assessed by hierarchy, organization, definitions, cross references, and decision pathway clarity. Fragmentation can be assessed by redundancy, contradiction, drift, layering, and misalignment. Linguistic decision signals can be assessed by modal consistency, qualifier clarity, and responsibility assignment. Instructional implementation can be assessed by training, retrieval practice, comprehension validation, and remediation. Supervisory control can be assessed by review duties, documentation, escalation, and correction. Digital implementation can be assessed by whether platform records show implementation or completion. Corrective feedback can be assessed by whether warning signs trigger review, retraining, discipline, audit, or revision.

The CCPFM is therefore both explanatory and diagnostic. It is explanatory because it describes how compliance centered systems produce failure through interacting mechanisms. It is diagnostic because it converts those mechanisms into evaluative criteria. The model does not merely say that a policy system is weak. It identifies where and how the weakness occurs. It can distinguish a structurally coherent but poorly trained Directive from a legally current but cognitively unusable Directive, or a digitally tracked but supervision disconnected Directive from a well trained but linguistically unstable Directive. This allows agencies and reviewers to identify the location of risk rather than describe the system globally as good or bad.

The model also provides a basis for risk scoring. Because the CCPFM domains can be observed, each domain can be scored by severity. The purpose of scoring is not to predict liability or assign blame. The purpose is to identify the level of policy system risk, prioritize remediation, compare policy clusters, and determine whether modernization requires isolated revision or architectural replacement. A scoring framework is especially useful because policy systems often contain mixed conditions. An agency may have strong digital records but weak comprehension validation. It may have legally current Directives but severe cross Directive fragmentation. It may have good training for use of force but poor supervisory correction for pursuits. Scoring allows those distinctions to be made.

The CCPFM also remains legally restrained. It does not claim that every high score creates municipal liability or that every low score prevents liability. Municipal liability requires legal elements outside the scope of a policy diagnostic model, including municipal fault, causation, notice where required, and connection to constitutional injury (*Board of County Commissioners v. Brown*, 1997; *City of Canton v. Harris*, 1989; *Connick v. Thompson*, 2011; *Monell v. Department of Social Services*, 1978). The model identifies policy system risk. It does not decide the legal outcome. Its legal value is evidentiary and analytical, not determinative.

The CCPFM also does not excuse individual misconduct. Officers remain responsible for lawful conduct, and Supervisors remain responsible for review, correction, and escalation. The model instead distinguishes between misconduct that occurs despite a functioning policy system and inconsistency that is made more likely by a weak policy system. That distinction matters because a functioning agency must address both. It must hold individuals accountable when they violate policy, and it must repair systems when policy architecture, training, supervision, digital process, or feedback loops make failure more likely.

The CCPFM should therefore be understood as a model of system risk. It identifies conditions under which policy systems are likely to produce interpretive instability, implementation drift, cognitive overload, weak comprehension, inconsistent supervision, and incomplete correction. It gives agencies a way to see weaknesses before they become visible through complaints, lawsuits, critical incidents, audits, or DOJ investigations. It gives reviewers a way to ask better questions. The question is not only whether the agency has a policy. The question is whether

the policy system operates as a coherent, trainable, cognitively usable, supervised, and correctable legal decision system.

IV. THEORETICAL FOUNDATIONS OF THE CCPFM

The CCPFM rests on an interdisciplinary foundation because municipal police policy failure is not exclusively a legal, administrative, cognitive, training, supervisory, or technological problem. It emerges where those domains interact. A model that evaluates only policy text will miss training failure. A model that evaluates only training will miss structural fragmentation. A model that evaluates only digital completion will miss comprehension. A model that evaluates only liability will miss the cognitive and instructional mechanisms that make failure foreseeable before litigation occurs. The CCPFM therefore draws from street level bureaucracy, Cognitive Load Theory, naturalistic decision making, policy design, administrative burden, systems failure theory, implementation science, organizational learning, and municipal liability doctrine.

The first foundation is street level bureaucracy. Lipsky (1980) established that frontline public servants exercise discretion while implementing formal policy under conditions of workload, uncertainty, resource constraint, and competing demands. Maynard Moody and Musheno (2003) similarly showed that frontline actors do not merely execute rules, but interpret them through practical judgment, institutional experience, and situated encounters. This is essential to police policy because Officers apply Directives in real operational environments, not in static reading conditions. A Directive therefore does not move automatically from written text to lawful conduct. It is interpreted through discretion. The CCPFM builds on this insight by asking whether the Directive system gives Officers a coherent and usable structure within which discretion can be lawfully exercised.

Police discretion literature reinforces this foundation. Mastrofski (2004) argued that controlling street level police discretion is a central problem of police governance, and Walker and Archbold (2018) describe written policy, supervision, training, and accountability as core mechanisms of police control. Those mechanisms matter because police work occurs in dispersed environments where real time supervisory presence is often limited. The CCPFM treats policy as one of the formal systems through which discretion is structured before field action occurs and reviewed after field action occurs. If the policy system is fragmented, vague, poorly trained, or weakly supervised, it cannot reliably serve that control function.

The second foundation is Cognitive Load Theory. Cognitive Load Theory begins from the premise that working memory is limited when processing novel, complex, or interacting information, while long term memory supports performance through schemas that organize information into usable patterns (Baddeley, 1992; Cowan, 2001; Sweller, 1988). Sweller et al. (1998) and Paas et al. (2003) distinguish intrinsic load, which arises from the complexity of the task, from extraneous load, which is imposed by poor instructional design, and germane load, which supports schema construction. This distinction is central to the CCPFM because police work is already intrinsically complex. The policy system should not add unnecessary extraneous load through fragmentation, ambiguity, density, unstable terminology, or cross reference dependency.

The cognitive load foundation allows the CCPFM to treat policy design as a human performance issue. A Directive may be legally accurate and still cognitively difficult to use. A long list of factors, exceptions, reporting duties, supervisory notifications, and cross references may appear comprehensive, but it may also exceed the user's ability to retrieve and apply the Directive under stress. Cognitive Load in Police Policy applied this principle directly to police Directives by

identifying complexity, ambiguity, structural inconsistency, information density, and redundancy as load inducing variables that can degrade comprehension, recall, schema activation, and recognition based decision making. The CCPFM incorporates those variables as diagnostic indicators.

The third foundation is naturalistic and recognition primed decision making. Klein (1998, 2008) showed that experienced personnel in time compressed operational environments often make decisions by recognizing patterns and matching them to workable responses rather than formally comparing every possible option. Kahneman (2011) similarly distinguished fast intuitive processing from slower analytical reasoning and showed how pressure, uncertainty, and cognitive demand can shape judgment. In policing, this means that Directives must be designed to support recognition, retrieval, and application before and during stressful events. Officers cannot reconstruct a complex policy architecture from first principles during a rapidly evolving encounter.

The CCPFM uses recognition primed decision making to explain why stable policy schemas matter. A schema allows an Officer to recognize that a condition triggers a duty, a prohibition, a discretionary option, a documentation requirement, or a supervisory notification. If the Directive system uses unstable definitions, unclear modal verbs, fragmented cross references, or inconsistent thresholds, the Officer may not have a stable schema to retrieve. Instead, the Officer may rely on habit, peer norms, prior experience, incomplete memory, or local practice. That is not always misconduct. It may be a predictable response to a policy system that did not provide usable decision architecture.

The fourth foundation is situation awareness theory. Endsley (1995) defined situation awareness as perception of relevant environmental elements, comprehension of their meaning, and projection of their future status. Endsley and Garland (2000) further explain that shared situation awareness is critical in complex operational environments where multiple actors possess partial information. Policy as a Cognitive System applied this framework to presidential protection and municipal police operations, arguing that policy architecture shapes perception, role assignment, communication, decision branching, and action under stress. The CCPFM incorporates this foundation because many police failures involve not only a wrong decision, but a degraded operational picture. Directives should reduce uncertainty, clarify roles, and standardize communication where possible.

The fifth foundation is policy design and administrative burden. Policy design scholarship recognizes that policies operate through instruments, rules, procedures, and implementation structures rather than through formal goals alone (Capano & Howlett, 2020; Howlett, 2019; Peters, 2018). Pressman and Wildavsky (1973) demonstrated that implementation can fail through accumulated complexity and coordination burden even when formal objectives are clear. Administrative burden scholarship further shows that policy systems impose learning, compliance, and psychological costs that shape behavior (Herd & Moynihan, 2019). The CCPFM applies these insights internally to police agencies. Officers, Supervisors, trainers, and administrators experience policy burden when they must learn, interpret, document, reconcile, and apply complex Directives.

This foundation is especially important because compliance centered policy systems often increase burden while appearing to increase control. Each new legal update, accreditation standard, reporting requirement, review step, or documentation duty may be justified in isolation. Over time, however, the cumulative system may become harder to understand, train, supervise, and apply. Instructional Systems Failure described this process as compliance

accretion. The CCPFM treats compliance accretion as a mechanism through which policy systems become structurally maladaptive when agencies add requirements without redesigning the architecture for coherence and usability.

The sixth foundation is organizational systems failure theory. Perrow (1984) argued that complex systems can fail through interactions among components rather than through one isolated human error. Reason (1990, 2000) distinguished active failures from latent conditions embedded within organizational systems. Vaughan (1996) demonstrated how organizations may normalize risky or defective practices over time when those practices become routine and do not immediately produce catastrophic failure. These theories are central to the CCPFM because legacy policy systems often contain latent defects. Fragmented Directives, unstable terminology, passive implementation, weak supervision, and digital completion dependence may remain hidden until a critical incident, lawsuit, audit, or complaint pattern exposes them.

Systems theory also prevents the CCPFM from reducing policy failure to individual Officer error. Officers may make mistakes. Some may commit misconduct. Supervisors may fail to correct. But repeated patterns of misapplication across personnel, policy domains, or incidents should trigger a system inquiry. The relevant question is whether the policy environment made error more likely. Did the Directive system communicate one coherent standard? Did the agency train the decision point? Did Supervisors have clear review duties? Did warning signs trigger correction? If not, the visible field error may be connected to deeper system design conditions.

The seventh foundation is organizational learning. Argyris and Schön (1978) distinguished between shallow correction and deeper learning that changes underlying assumptions and systems. Senge (1990) similarly emphasized that organizations must understand systemic relationships rather than merely react to surface symptoms. This matters because a compliance centered policy system may respond to failure by adding another paragraph, another acknowledgment, another reporting requirement, or another proof. A learning system asks whether the prior architecture produced the failure. The CCPFM therefore treats corrective feedback as a diagnostic domain. Complaints, audits, litigation, training failures, internal affairs findings, and supervisory reviews should feed back into policy revision and training improvement.

The eighth foundation is implementation science. Implementation science distinguishes adoption from implementation fidelity. Fixsen et al. (2005) argued that implementation requires competency drivers, organizational supports, leadership, feedback, and continuous improvement. Durlak and DuPre (2008) found that implementation quality affects outcomes and depends on organizational capacity, training, monitoring, and support. Nilsen (2015) emphasized that implementation research focuses on the mechanisms through which formal decisions become actual practice. This distinction is directly applicable to police policy. Adopting a Directive, uploading it into PowerDMS, or collecting acknowledgments is not the same as implementing it. The CCPFM therefore evaluates whether policy implementation is supported by training, comprehension validation, supervision, and correction.

The ninth foundation is learning science and training transfer. Roediger and Karpicke (2006) showed that retrieval practice strengthens long term retention. Dunlosky et al. (2013) identified practice testing and distributed practice as high utility learning techniques. Baldwin and Ford (1988) and Blume et al. (2010) showed that transfer of training into workplace behavior depends on training design, trainee characteristics, and work environment. Kirkpatrick and Kirkpatrick (2006) distinguished training delivery from learning, behavior, and results. These sources support the CCPFM's distinction between passive dissemination and comprehension validation.

A Directive has not been implemented merely because personnel received or acknowledged it. The agency must determine whether personnel learned and can apply it.

The tenth foundation is legal interpretation and drafting theory. Scalia and Garner (2012) recognize that mandatory and permissive language can carry substantive interpretive consequences. Tiersma (1999) shows that legal language often creates comprehension and interpretation problems when formal terms are unstable or unclear. The Office of the Federal Register (2017) provides plain language drafting guidance that favors must over shall for clear obligation. From Language to Action applied these principles to police Directives by showing that modal verbs operate as decision triggers. The CCPFM incorporates this foundation by treating obligation language as measurable. Must, may, should, shall, when feasible, and as appropriate are not neutral words when they govern field decisions.

The eleventh foundation is municipal liability doctrine. *Monell v. Department of Social Services* (1978) established that municipalities may be liable under Section 1983 only when constitutional injury is caused by municipal policy, custom, practice, or decision, not merely because the municipality employed the offending Officer. *City of Canton v. Harris* (1989) recognized that failure to train may create municipal liability when deliberate indifference to constitutional rights is shown. *Connick v. Thompson* (2011) emphasized that pattern based notice is ordinarily necessary in failure to train claims. *Board of County Commissioners v. Brown* (1997) requires rigorous proof of municipal culpability and causation. The CCPFM does not replace those doctrines. It identifies policy system risk conditions that may become relevant to training, supervision, correction, notice, and causation analysis.

The twelfth foundation is police reform and DOJ pattern or practice findings. Federal investigations have repeatedly identified deficiencies in policy clarity, training, supervision, force review, accountability, and feedback systems in municipal police agencies (U.S. Department of Justice, 2014, 2015, 2016, 2017, 2023, 2024). The Philadelphia deadly force assessment similarly identified weaknesses in policy guidance, training, investigation, and review (Fachner & Carter, 2015). These findings show that policy failure often involves more than the absence of rules. It involves the failure to translate written expectations into trained, supervised, and corrected practice. The CCPFM provides a diagnostic structure for evaluating those conditions.

Taken together, these foundations support the central premise of the CCPFM. Police policy systems are not merely legal documents, administrative files, or accreditation artifacts. They are organizational decision systems. They operate through architecture, language, cognition, training, supervision, digital infrastructure, and feedback. When those components are coherent and aligned, policy can support lawful action and organizational learning. When they are fragmented, ambiguous, cognitively burdensome, passively implemented, weakly supervised, digitally completion centered, and disconnected from correction, policy failure becomes predictable. The CCPFM formalizes that predictable failure into a diagnostic model.

V. CORE FAILURE DOMAINS OF THE CCPFM

The CCPFM organizes compliance centered policy failure into eight core diagnostic domains. These domains are not separate silos. They are interacting parts of one policy system. A weakness in one domain may intensify weakness in another. Fragmented architecture can increase cognitive load. Unstable language can weaken supervision. Passive dissemination can leave cognitive burden undetected. Digital completion can conceal weak implementation. The value of the CCPFM is that it separates these domains for diagnosis while preserving the larger causal relationship among them.

The first domain is policy architecture. Policy architecture refers to the structure through which the Directive system organizes legal authority, definitions, duties, thresholds, decision pathways, documentation requirements, supervisory responsibilities, training links, digital workflows, and corrective feedback. Instructional Systems Failure Theory identified policy architecture as an independent causal variable because the way the policy system is built affects how Officers retrieve, understand, apply, supervise, and correct policy under operational conditions (Bremer, 2025a). The diagnostic question is whether the Directive system is built as a coherent decision architecture or merely as an accumulated collection of documents.

Policy architecture can be evaluated through several indicators. A strong architecture has clear hierarchy, stable organization, controlled definitions, consistent sequencing, visible decision points, limited unnecessary cross references, and direct alignment between Officer duties, Supervisor duties, training requirements, and review mechanisms. A weak architecture contains scattered rules, unclear hierarchy, excessive cross references, inconsistent structure, policy topics distributed across unrelated documents, and no obvious pathway from legal standard to field action. Human factors research supports this focus because information architecture affects usability, workload, error, and task performance (Norman, 2013; Wickens et al., 2015).

The second domain is structural fragmentation. Fragmentation occurs when the Directive system appears complete when policies are reviewed separately but becomes inconsistent when related Directives are examined together. Fragmented Policy Systems identified redundancy, contradiction, drift, layering, and misalignment as the primary mechanisms through which decentralized drafting produces structural inconsistency (Bremer, 2024a). Public administration literature supports this distinction because coordination, coherence, and integration are related but distinct conditions (Cejudo & Michel, 2017; Trein et al., 2019). A policy system may be coordinated around required topics while still failing to operate coherently as an integrated Directive architecture.

Structural fragmentation can be diagnosed by reviewing related policy clusters. The reviewer should determine whether related Directives use the same definitions, thresholds, reporting duties, Supervisor responsibilities, documentation requirements, and review processes. Indicators of fragmentation include duplicate rules expressed differently, related Directives revised on different timelines, forms that do not match the governing Directive, training bulletins that alter practice without policy revision, conflicting Supervisor duties, and inconsistent terminology across the manual. The core question is whether related Directives produce one operational answer or require Officers and Supervisors to reconcile the system themselves.

The third domain is linguistic decision signal stability. Policy language is not merely descriptive. It communicates obligation, discretion, permission, prohibition, expectation, responsibility, and review criteria. From Language to Action argued that modal verbs operate as decision triggers because they tell Officers what is mandatory, what is permitted, and what is expected (Bremer, 2024b). Legal interpretation and drafting authorities similarly recognize that mandatory and permissive language carries interpretive significance (Office of the Federal Register, 2017; Scalia & Garner, 2012; Tiersma, 1999). The diagnostic question is whether the Directive system uses language in a controlled and predictable way.

Indicators of linguistic decision signal failure include inconsistent use of must, may, should, shall, and will, undefined qualifiers such as when feasible or as appropriate, passive responsibility language, unclear actors, unstable terminology, vague thresholds, and failure to distinguish rules from factors, exceptions, and documentation duties. A Directive that says an

Officer should notify a Supervisor when appropriate communicates much less than a Directive that identifies the exact conditions requiring notification. The issue is not style. It is operational meaning. When language does not produce stable decision signals, Officers and Supervisors must interpret the agency's obligation structure during or after the event.

The fourth domain is Policy Cognitive Load. Policy Cognitive Load is the burden imposed by Directive structure, complexity, ambiguity, information density, redundancy, branching, cross reference dependency, and training misalignment during interpretation, recall, and field application. Cognitive Load in Police Policy argued that these conditions can overload working memory, degrade comprehension, disrupt schema activation, and produce inconsistent application under operational conditions (Bremer, 2025b). Cognitive Load Theory supports this domain because working memory is limited and instructional design can increase or reduce extraneous cognitive load (Paas et al., 2003; Sweller, 1988; Sweller et al., 1998).

Policy Cognitive Load can be diagnosed by examining whether a Directive can be understood, remembered, trained, and applied without unnecessary processing burden. Indicators of excessive load include long undifferentiated paragraphs, multiple nested exceptions, excessive conditional branches, repeated cross references, high information density, inconsistent sequencing, unexplained legal terminology, and lack of visible decision thresholds. A policy may be legally correct and still cognitively weak. The diagnostic question is whether the Directive is built for operational retrieval under stress or for administrative completeness after the fact.

The fifth domain is instructional implementation. Instructional implementation concerns whether the agency converts Directives into operational knowledge. Policy Without Comprehension argued that passive dissemination verifies exposure without proving comprehension, retention, retrieval, or application (Bremer, 2025c). Learning science supports this domain because active retrieval, practice testing, and distributed practice strengthen retention more effectively than passive review (Dunlosky et al., 2013; Roediger & Karpicke, 2006). Training evaluation literature also distinguishes delivery from learning, transfer, behavior, and results (Arthur et al., 2003; Baldwin & Ford, 1988; Kirkpatrick & Kirkpatrick, 2006).

Instructional implementation indicators include whether the agency classifies Directives by risk, trains material revisions, uses comprehension checks, requires scenario application, reinforces policy through roll call or supervisory review, tracks remediation, and revisits high liability topics through distributed practice. Weak indicators include email only dissemination, acknowledgment only implementation, no knowledge checks, no application exercises, no remediation records, no training update after material revision, and no evidence that Officers can apply the policy in field like conditions. The diagnostic question is whether the agency taught the Directive or merely sent it.

The sixth domain is supervisory control. Supervisory control concerns whether the Directive system assigns Supervisors meaningful review, documentation, correction, escalation, and feedback responsibilities. Legacy Police Policy Systems as Evidence of Failure to Train and Failure to Supervise Liability argued that a Directive system is incomplete when it states Officer duties but fails to define the supervisory mechanisms needed to enforce, correct, and learn from those duties (Bremer, 2026b). Police accountability literature supports this domain because supervision is central to controlling discretion and maintaining organizational accountability in dispersed field environments (Mastrofski, 2004; Walker & Archbold, 2018).

Supervisory control indicators include whether Directives specify Supervisor response duties, review standards, documentation requirements, escalation triggers, training referrals, command

notifications, corrective counseling procedures, and audit responsibilities. Weak indicators include generic language stating that Supervisors shall ensure compliance without identifying what must be reviewed or corrected, inconsistent review forms, no requirement to document policy corrections, no process for repeated errors, and no connection between Supervisor findings and policy or training revision. The diagnostic question is whether supervision is designed into the Directive system or merely assumed by rank.

The seventh domain is digital implementation. Digital implementation concerns whether digital policy systems document meaningful implementation or merely administrative completion. Digitized Compliance argued that PowerDMS and similar systems are legally neutral but operationally consequential infrastructure capable of disciplining implementation or amplifying passive compliance (Bremer, n.d.). Implementation science supports this domain because adoption of a platform or program does not prove implementation fidelity (Durlak & DuPre, 2008; Fixsen et al., 2005; Nilsen, 2015). The diagnostic question is not whether the agency uses a digital system. The question is what the digital record proves.

Digital implementation indicators include whether the platform links Directives to training, assigns comprehension checks, tracks material revision review, alerts Supervisors, records remedial assignments, preserves version control, documents policy review after warning signs, and connects accreditation proofs to actual implementation. Weak indicators include acknowledgment only assignments, dashboard completion as the main success metric, standards mapping without training proof, no linked testing, no Supervisor follow up, no remediation records, and no revision workflow after operational problems appear. A digital platform can prove disciplined governance. It can also prove that the agency tracked signatures and little more.

The eighth domain is corrective feedback. Corrective feedback concerns whether operational information returns to the policy system and changes it when necessary. Complaints, use of force reviews, pursuit reviews, body camera audits, report deficiencies, internal affairs findings, training failures, legal updates, litigation, suppression rulings, and Supervisor identified confusion should be treated as policy system information. Organizational learning theory supports this domain because meaningful learning requires changing the underlying system rather than only correcting surface symptoms (Argyris & Schön, 1978; Senge, 1990). Systems theory similarly explains that latent conditions persist when organizations do not detect and correct weak signals (Perrow, 1984; Reason, 1990).

Corrective feedback indicators include whether the agency has defined triggers for policy review, whether repeated errors require Training Function analysis, whether internal affairs patterns feed policy revision, whether legal updates trigger training and review, whether audits result in corrective action, and whether digital workflows preserve the correction path. Weak indicators include complaint files isolated from policy review, repeated force issues without retraining, pursuit crashes without Directive revision, body camera failures without implementation analysis, and legal changes incorporated into text but not training. The diagnostic question is whether the policy system learns.

These eight domains establish the diagnostic structure of the CCPFM. Policy architecture identifies the system's design. Structural fragmentation identifies incoherence across Directives. Linguistic decision signals identify instability in obligation language. Policy Cognitive Load identifies whether the Directive is cognitively usable. Instructional implementation identifies whether personnel learned the Directive. Supervisory control identifies whether field application is reviewed and corrected. Digital implementation identifies whether technology documents

implementation or completion. Corrective feedback identifies whether the agency learns from warning signs.

The domains should be evaluated both separately and together. A policy system may score well in one domain and poorly in another. For example, an agency may have strong digital records but weak comprehension validation. It may have legally current Directives but serious modal instability. It may have adequate training for one high liability cluster but severe fragmentation across related Directives. The CCPFM prevents a single strength from masking system weakness. It also prevents one weakness from being misunderstood outside the larger system.

The most important point is interaction. Moderate weakness in several domains may create greater risk than one isolated defect. A fragmented Directive that is also linguistically unstable, cognitively dense, passively disseminated, weakly supervised, digitally acknowledged only, and disconnected from feedback presents a compound failure condition. This is why the CCPFM is not merely a checklist. It is a model of coupled failure domains. The diagnostic purpose is to identify not only whether risk exists, but how the risk is produced and where correction must begin.

VI. DIAGNOSTIC CRITERIA AND OBSERVABLE INDICATORS

The CCPFM is designed to be applied, not merely described. For the model to be useful, each failure domain must be translated into diagnostic criteria and observable indicators. A reviewer should be able to examine policy text, related Directives, forms, training files, digital platform records, supervisory review documents, internal affairs records, complaint histories, audits, and revision logs to determine whether the agency's policy system functions as a coherent legal decision system or merely as a compliance documentation structure. This section converts the CCPFM domains into practical indicators that can be observed, documented, and scored.

The first diagnostic category is policy text indicators. Policy text should be evaluated for clarity, hierarchy, decision pathway structure, modal consistency, defined terms, actor responsibility, and operational sequence. Strong policy text identifies who must act, when action is required, what conditions trigger the duty, what discretion remains, what documentation follows, and what Supervisors must review. Weak policy text contains undefined thresholds, inconsistent modal verbs, passive responsibility language, vague qualifiers, excessive legalistic phrasing, long undifferentiated paragraphs, unclear exceptions, and cross references that force the user to reconstruct the rule from multiple locations. From Language to Action identified modal instability as a decision signal failure because unclear obligation language distorts perceived duty and increases interpretive variability (Bremer, 2024b). Cognitive Load in Police Policy similarly identified ambiguity and density as load inducing conditions that interfere with comprehension and application (Bremer, 2025b).

The second diagnostic category is system architecture indicators. A policy system should be evaluated by comparing related Directives, not by reviewing each Directive in isolation. Strong architecture aligns definitions, thresholds, reporting requirements, supervisory duties, training references, documentation rules, forms, and review standards across the policy system. Weak architecture produces redundancy, contradiction, drift, layering, and misalignment across related Directives. Fragmented Policy Systems identified those mechanisms as predictable outputs of decentralized policy production without centralized architectural control (Bremer, 2024a). The reviewer should therefore examine whether the agency has a policy collection or a policy system. A policy collection contains documents. A policy system produces one coherent operational answer across documents.

System architecture indicators are often visible in high liability policy clusters. A use of force cluster, for example, should include aligned force definitions, reporting thresholds, body worn camera requirements, medical aid duties, Supervisor response rules, internal affairs referral triggers, training requirements, and review procedures. A pursuit cluster should align initiation criteria, termination standards, Supervisor authority, radio communication, documentation, crash review, discipline, and retraining. A body worn camera cluster should align activation duties, exceptions, documentation, review, evidence retention, complaint investigation, and supervisory audits. If these related documents operate on different assumptions, the agency has architectural fragmentation. Public administration scholarship supports the need to examine integration and coherence rather than mere policy presence (Cejudo & Michel, 2017; Trein et al., 2019).

The third diagnostic category is legal and operational sufficiency indicators. A Directive should identify the legal authority supporting the policy, define key terms, identify foreseeable operational issues, assign Officer and Supervisor duties, specify documentation, and provide review and training requirements. The Autonomous Vehicle Operations and Enforcement sufficiency paper illustrates this applied logic. It argued that a defensible Directive should include legal authority, definitions, recognition procedures, enforcement procedures, remote operator communication, malfunction and hazard response, emergency scene management, crash response, digital evidence handling, documentation, supervisory responsibilities, training, interagency coordination, audit, and policy review (Bremer, 2026d). That logic generalizes beyond autonomous vehicles. A Directive is sufficient only when it covers the legal, operational, investigative, supervisory, training, and review issues that are reasonably foreseeable for the subject.

The fourth diagnostic category is cognitive usability indicators. A Directive should be evaluated for whether it can be understood, remembered, retrieved, and applied under operational conditions. Indicators of strong cognitive usability include clear sequencing, short operational paragraphs, defined decision triggers, separated rules and exceptions, visible documentation requirements, consistent terminology, and limited unnecessary branching. Indicators of weak cognitive usability include dense policy blocks, excessive condition stacking, multiple nested exceptions, unclear hierarchy, repeated cross references, unstable terminology, and failure to convert legal standards into operational decision points. Cognitive Load Theory supports this criterion because poorly designed instructional information increases extraneous load, which impairs comprehension and performance (Paas et al., 2003; Sweller, 1988; Sweller et al., 1998). The policy is not usable merely because it is accurate. It must be cognitively accessible.

The fifth diagnostic category is obligation signal indicators. The reviewer should determine whether the Directive system uses a controlled modal language framework. Strong systems reserve must for mandatory duties, must not for prohibitions, may for authorized discretion, and should for expected practice that allows justified deviation. Strong systems also define discretionary qualifiers when they affect high liability decisions. Weak systems use must, shall, should, may, will, when feasible, if possible, and as appropriate inconsistently or interchangeably. Weak systems also fail to identify who owns the duty. Legal interpretation scholarship and drafting guidance support the significance of obligation language because mandatory and permissive terms carry substantive interpretive consequences (Office of the Federal Register, 2017; Scalia & Garner, 2012; Tiersma, 1999). In the CCPFM, modal instability is an observable risk indicator.

The sixth diagnostic category is training and comprehension indicators. The reviewer should determine whether the agency can prove only exposure or can prove operational understanding. Strong indicators include documented training tied to material revisions, knowledge checks, scenario based application, retrieval practice, periodic reinforcement, remedial assignments, and records showing that misunderstandings were corrected. Weak indicators include email only dissemination, policy portal posting, electronic acknowledgment, LMS completion without knowledge assessment, no scenario practice, no remediation record, no training update after material revision, and no risk based implementation classification. Policy Without Comprehension identified passive dissemination as a systemic instructional failure because it verifies receipt rather than comprehension (Bremer, 2025c). Learning science supports this distinction because retrieval practice and distributed practice produce stronger retention than passive review (Dunlosky et al., 2013; Roediger & Karpicke, 2006).

The seventh diagnostic category is training transfer indicators. Training is incomplete unless learned policy transfers into field behavior. Strong transfer indicators include Supervisor reinforcement, report review tied to training objectives, body worn camera review for policy application, scenario performance records, field training alignment, remedial training after repeated errors, and documented behavior change after training. Weak transfer indicators include attendance rosters without learning evaluation, lesson plans disconnected from policy language, training bulletins not incorporated into Directives, and no evidence that training affected field practice. Training transfer literature supports this focus because transfer depends on training design, trainee readiness, and the work environment (Baldwin & Ford, 1988; Blume et al., 2010). The CCPFM therefore asks whether policy training became operational conduct.

The eighth diagnostic category is supervisory control indicators. Strong supervisory indicators include assigned review duties, clear review criteria, documentation requirements, escalation triggers, correction duties, training referrals, command notifications, and pattern detection requirements. Weak indicators include generic statements that Supervisors shall ensure compliance without explaining how, no required review checklist, no correction documentation, no pattern escalation, no link between Supervisor findings and training, and no requirement to review repeated policy misunderstandings. Legacy Police Policy Systems as Evidence argued that policies become dangerous when they state Officer duties without creating supervisory mechanisms for review, correction, discipline, and revision (Bremer, 2026b). Police accountability literature similarly treats supervision as a core mechanism for controlling discretion and ensuring accountability (Mastrofski, 2004; Walker & Archbold, 2018).

The ninth diagnostic category is digital platform indicators. Digital systems should be reviewed for what they prove. Strong digital indicators include version control, material revision identification, linked training assignments, comprehension checks, Supervisor alerts, remedial assignments, overdue escalation, policy review workflows, audit trails, and evidence that warning signs triggered revision. Weak indicators include acknowledgment only assignments, dashboard completion as the primary success metric, standards mapping without training proof, no linked testing, no Supervisor follow up, no remediation, no risk classification, and no documented action after warning signs. Digitized Compliance argued that PowerDMS and similar platforms can either support implementation or amplify passive completion depending on agency use (Bremer, n.d.). Implementation science reinforces this distinction because adoption of a tool does not prove implementation fidelity (Durlak & DuPre, 2008; Fixsen et al., 2005; Nilsen, 2015).

The tenth diagnostic category is feedback loop indicators. Strong feedback systems connect complaints, internal affairs findings, use of force reviews, pursuit reviews, body worn camera

audits, report deficiencies, suppression rulings, lawsuits, legal changes, training failures, and Supervisor identified confusion to policy review and correction. Weak systems isolate these records in separate administrative silos. A complaint may remain in internal affairs. A training failure may remain in the Training Function. A pursuit crash may remain in a traffic review. A body worn camera audit may remain in an audit file. A human centered legal decision system connects those warning signs back to policy architecture. Organizational learning theory supports this requirement because meaningful learning requires changing the system that produced the error, not merely correcting the visible event (Argyris & Schön, 1978; Senge, 1990).

The eleventh diagnostic category is warning sign response indicators. The reviewer should examine whether the agency responded to known or foreseeable risks. Strong indicators include policy revision after legal change, retraining after repeated errors, supervisory reinforcement after audit findings, discipline where appropriate, remedial assignments after comprehension failures, and documented review of recurring complaint patterns. Weak indicators include repeated similar complaints with no policy review, repeated report deficiencies with no training response, use of force review concerns with no remediation, pursuit crashes with no policy revision, and legal updates incorporated into text but not training. The legacy liability paper identified warning signs as the point where policy weakness becomes more legally and operationally significant (Bremer, 2026b). Systems theory similarly warns that latent conditions persist when organizations fail to respond to weak signals (Reason, 1990).

The twelfth diagnostic category is evidentiary sufficiency indicators. A strong policy system produces evidence of function, not merely evidence of presence. The agency should be able to show that a Directive was current, coherent, trained, understood, supervised, corrected, and revised. Weak evidence shows only that the policy existed, was assigned, was acknowledged, and was stored. This distinction matters because municipal liability doctrine focuses on municipal policy, custom, training, supervision, fault, and causation, not mere policy existence (Board of County Commissioners v. Brown, 1997; City of Canton v. Harris, 1989; Connick v. Thompson, 2011; Monell v. Department of Social Services, 1978). The CCPFM does not decide liability, but it evaluates whether the record supports policy function.

The thirteenth diagnostic category is policy cluster risk. CCPFM review should focus especially on high liability clusters rather than treating every Directive as equal. High liability clusters include use of force, vehicle pursuits, search and seizure, custody and prisoner handling, mental health response, domestic violence response, duty to intervene, body worn camera use, internal affairs, supervisory review, and training. These clusters should receive higher scrutiny because errors in these areas are more likely to affect constitutional rights, bodily integrity, public safety, evidence integrity, public legitimacy, and litigation exposure. City of Canton's failure to train doctrine is particularly relevant because agencies know Officers will face recurring constitutional decision points (City of Canton v. Harris, 1989).

The fourteenth diagnostic category is system ownership indicators. Strong systems assign responsibility for policy architecture to a defined function or role. Weak systems distribute authorship, revision, approval, training, accreditation, and digital management without a central architectural owner. Fragmented Policy Systems argued that decentralized production without centralized coherence control predictably generates system fragmentation (Bremer, 2024a). Organizational theory supports this because differentiated functions require integration mechanisms when their outputs are interdependent (Lawrence & Lorsch, 1967; Thompson, 1967). A reviewer should therefore ask who owns system coherence, not merely who approves individual Directives.

The fifteenth diagnostic category is modernization readiness. A legacy policy system may require isolated editing, cluster level repair, or full architectural replacement. Isolated editing may be appropriate when one term, threshold, citation, or supervisory duty is missing. Cluster repair may be required when related Directives are misaligned. Architectural replacement may be required when fragmentation, linguistic instability, passive dissemination, weak supervision, digital completion dependence, and absent feedback loops are systemic. Instructional Systems Failure argued that many legacy policy systems require first principles architectural replacement rather than incremental additions (Bremer, 2025a). The CCPFM makes that determination diagnosable.

These diagnostic criteria are intended to produce evidence based policy analysis. The reviewer should not rely on impressions such as the policy seems good, the manual is current, or the agency uses PowerDMS. The reviewer should identify observable indicators, classify the domain affected, determine severity, and explain the interaction effect. The strength of the CCPFM is that it converts broad policy criticism into structured findings. It helps the reviewer state what is wrong, where it is located, why it matters, and what must be corrected.

The diagnostic criteria also prevent overstatement. A single weak indicator does not necessarily mean the policy system is failing. One unclear phrase may be correctable. One missing training record may be an administrative oversight. One outdated cross reference may have little operational effect. The CCPFM becomes most useful when it identifies patterns. Repeated indicators across domains suggest system risk. Fragmentation plus modal instability plus acknowledgment only implementation plus weak supervision presents a stronger risk condition than any one defect alone.

The section's conclusion is direct. Policy system failure can be observed. It can be identified in text, architecture, training, supervision, digital records, and feedback loops. The CCPFM provides the categories needed to make those observations systematic. The next step is to convert these indicators into a risk scoring framework so that agencies and reviewers can evaluate severity, compare policy clusters, and prioritize modernization.

VII. RISK SCORING FRAMEWORK

The CCPFM requires a structured scoring framework because policy system risk should be evaluated consistently rather than impressionistically. A reviewer should not simply conclude that a policy system is "good," "weak," "modern," or "outdated." Those terms are too general to support diagnosis, prioritization, or corrective action. The purpose of CCPFM scoring is to identify the location, severity, and interaction of policy system weaknesses across the model's diagnostic domains. The score does not determine legal liability, predict a specific constitutional violation, or replace professional judgment. It identifies policy system risk.

The scoring framework should be applied to the eight CCPFM domains: policy architecture, structural fragmentation, linguistic decision signals, Policy Cognitive Load, instructional implementation, supervisory control, digital implementation, and corrective feedback. Each domain should be scored separately so that strength in one area does not conceal weakness in another. This is important because legacy systems often appear strong in administrative documentation while remaining weak in operational function. For example, an agency may have excellent digital records but poor comprehension validation. Another agency may have current legal language but severe fragmentation across related Directives. A third may have strong

training files but weak supervisory review and no corrective feedback loop. Separate scoring preserves diagnostic precision.

Each domain should be scored on a 0 to 4 scale. A score of 0 means no meaningful risk is identified in that domain. A score of 1 means low risk, usually an isolated weakness that can be corrected through limited revision or administrative adjustment. A score of 2 means moderate risk, meaning the weakness appears more than once or affects a meaningful part of the Directive system, but does not yet appear systemic. A score of 3 means high risk, meaning the weakness is recurring, affects high liability policy areas, or substantially impairs implementation, supervision, training, or policy coherence. A score of 4 means critical risk, meaning the weakness is systemic, affects high liability decisions, is connected to warning signs, or remains uncorrected despite evidence that the system is not functioning.

A 0 score should be reserved for domains where the agency demonstrates meaningful control. In policy architecture, a 0 would mean related Directives are coherently organized, definitions are stable, decision pathways are visible, and related systems align. In instructional implementation, a 0 would mean high liability Directives are trained, tested, reinforced, and remediated when necessary. In digital implementation, a 0 would mean the platform documents more than completion and supports implementation through training linkage, comprehension validation, supervisory alerts, remediation, and revision workflows. A 0 should not mean perfection. It means no material risk indicator is presently identified.

A 1 score reflects isolated or minor weakness. For example, a Directive may contain one undefined term, one outdated cross reference, or one minor modal inconsistency that does not materially affect the operational decision pathway. A 1 may also apply where a training record is incomplete but other evidence shows the Directive was trained and reinforced. These are correctable weaknesses, but they do not indicate broader system failure. The purpose of identifying a 1 score is to ensure that small problems are corrected before they become embedded through drift or repetition.

A 2 score reflects moderate risk. At this level, the weakness is no longer isolated. The agency may have recurring inconsistent terminology across related Directives, several passive dissemination practices for moderate risk policies, inconsistent supervisory documentation, or digital records that show acknowledgment but limited implementation support. A 2 score does not mean the system is failing, but it indicates that the agency should correct the domain before the weakness becomes normalized. Systems theory supports this type of early detection because latent conditions often exist before visible operational failure occurs (Perrow, 1984; Reason, 1990).

A 3 score reflects high risk. At this level, the weakness affects high liability Directives or impairs a core implementation function. Examples include use of force Directives that conflict with reporting or review procedures, pursuit policies that lack clear termination and supervisory authority, search and seizure policies that are distributed without training or comprehension checks, or digital records showing repeated acknowledgment only implementation for material revisions. A 3 score indicates that the agency's policy system may be producing substantial operational uncertainty. The domain should be prioritized for corrective action.

A 4 score reflects critical risk. A 4 should be assigned where the weakness is systemic, affects high liability decisions, and is connected to warning signs or uncorrected operational evidence. Examples include repeated complaints or incidents involving the same policy misunderstanding without revision or retraining, body worn camera audits showing recurring noncompliance

without corrective action, repeated pursuit crashes without policy review, force review deficiencies without supervisory retraining, or digital records showing acknowledgment only implementation after the agency had notice of confusion. At this level, the issue is not merely policy weakness. It is potential system failure. The liability paper in this series emphasized that warning signs become legally and operationally significant when the agency fails to revise, retrain, supervise, discipline, or correct in response to known or foreseeable risk (Bremer, 2026b).

The scoring framework should be applied first at the domain level and then at the policy cluster level. Domain scoring identifies the type of weakness. Cluster scoring identifies where that weakness occurs. High liability clusters should receive priority because they involve recurring constitutional or safety decision points. These include use of force, vehicle pursuits, search and seizure, custody and prisoner handling, body worn camera activation, mental health response, domestic violence response, duty to intervene, internal affairs, supervisory review, and training. *City of Canton v. Harris (1989)* is relevant here because failure to train doctrine recognizes that agencies know Officers will face recurring constitutional tasks. The CCPFM uses that same logic for diagnostic priority. The more foreseeable and consequential the decision point, the stronger the need for coherent, trained, supervised, and correctable policy architecture.

The model should therefore use weighted review for high liability clusters. A low risk administrative Directive with a moderate drafting weakness may not require urgent intervention. A high liability Directive with the same weakness may require immediate correction. For example, unclear modal language in a uniform appearance Directive may be a low priority issue. Unclear modal language in a duty to intervene Directive may create significant operational risk because it affects when Officers understand intervention as mandatory rather than discretionary. The scoring framework should therefore consider both severity and policy context.

A basic aggregate risk score can be calculated by assigning each of the eight domains a 0 to 4 score, producing a possible total score from 0 to 32. A score from 0 to 7 may indicate low system risk. A score from 8 to 15 may indicate moderate system risk. A score from 16 to 23 may indicate elevated system risk. A score from 24 to 31 may indicate high system risk. A score of 32 indicates critical legacy system risk. These bands should be treated as diagnostic guides, not mathematical proof. They assist comparison and prioritization, but they do not replace narrative findings.

The score should always be accompanied by written findings. The number identifies severity, but the narrative explains the mechanism. A domain score of 3 in structural fragmentation should explain whether the problem is redundancy, contradiction, drift, layering, misalignment, or lack of architectural ownership. A score of 3 in instructional implementation should explain whether the agency relied on passive dissemination, failed to validate comprehension, failed to train material revisions, or failed to remediate misunderstanding. A score of 4 in corrective feedback should explain what warning signs appeared, who received them, and what correction did or did not occur. Without narrative findings, the score becomes another compliance artifact.

The scoring framework should also identify interaction effects. Interaction effects occur when weaknesses in multiple domains reinforce one another. A Directive with moderate linguistic instability may become high risk when combined with passive dissemination and weak supervision. A fragmented policy cluster may become more dangerous when the digital platform shows only acknowledgment and no training linkage. A cognitively dense Directive may be manageable if training and supervision are strong, but dangerous if the agency relies only on

self review. The CCPFM therefore should not only add scores mechanically. It should identify when domain combinations create compounded risk.

For that reason, the scoring framework should include an interaction modifier. If three or more domains score 2 or higher within a high liability policy cluster, the reviewer should consider raising the overall cluster risk level by one band. If two or more domains score 3 or higher and warning signs are present, the reviewer should consider treating the cluster as high or critical risk even if the numerical total alone would place it lower. This reflects the model's central theory: policy system failure is emergent. Moderate weaknesses can become dangerous when they interact.

The scoring framework should also include a warning sign modifier. Warning signs include complaints, lawsuits, internal affairs findings, use of force review deficiencies, pursuit crashes, body camera audit failures, suppression rulings, legal updates, repeated training failures, Supervisor identified confusion, report deficiencies, and digital noncompletion patterns. If a domain weakness exists without warning signs, the risk may be prospective. If the same weakness exists after warning signs, the risk increases because the agency has evidence that the system may not be functioning. The legal significance of notice varies by context, but as a diagnostic matter, warning signs should elevate risk (Bremer, 2026b; Connick v. Thompson, 2011).

The model should also distinguish between text risk, implementation risk, and evidence risk. Text risk concerns what the Directive says and how it is structured. Implementation risk concerns whether personnel were trained, understood, supervised, and corrected. Evidence risk concerns what the agency can prove. These categories may not align. An agency may have a weak text but strong training that compensates in practice. Another agency may have a strong text but weak implementation evidence. Another may have both weak implementation and a digital record that proves the weakness. CCPFM scoring should identify these distinctions because the corrective action differs.

A text risk may be corrected through rewriting, structural alignment, controlled terminology, or cross Directive integration. An implementation risk may require training redesign, comprehension validation, Supervisor reinforcement, or remediation workflows. An evidence risk may require improved documentation, digital configuration, version control, or linkage between policy, training, supervision, and correction records. A single aggregate score cannot tell the agency what to do unless the underlying risk type is identified. The CCPFM therefore should pair each score with corrective categories.

The scoring framework also should preserve legal restraint. A high CCPFM score does not prove deliberate indifference, causation, or municipal liability. Those are legal determinations requiring fact specific analysis under Monell, City of Canton, Connick, and Brown. The score identifies policy system vulnerability. It may help explain where an agency is exposed, but it does not resolve constitutional doctrine. This restraint strengthens the model because it prevents diagnostic scoring from becoming overstated legal conclusion. The model is designed to support analysis, not replace it.

The scoring framework can be used prospectively or retrospectively. Prospectively, an agency can apply the model before a failure occurs to identify which policy clusters need modernization. Retrospectively, a reviewer can apply it after an incident to determine whether the policy system contributed to misunderstanding, drift, weak supervision, or implementation opacity. The same

framework can therefore support risk management, accreditation supplementation, command review, training planning, legal defense preparation, expert analysis, and policy modernization.

The scoring framework should be applied with documentation. Reviewers should cite the specific Directives, sections, forms, training records, digital assignments, supervisory reviews, complaint files, audits, and revision histories that support each score. A score unsupported by evidence is not diagnostic. The purpose of the CCPFM is not to create another subjective opinion about policy quality. It is to discipline policy review by tying findings to observable indicators.

The scoring framework's ultimate value is prioritization. Agencies often have large manuals and limited time. They cannot rebuild everything at once. CCPFM scoring allows agencies to identify the highest risk clusters, the weakest domains, and the most urgent corrective actions. A system with high fragmentation and high cognitive load may need architectural redesign. A system with strong architecture but weak comprehension validation may need training and implementation reform. A system with strong text and training but weak supervisory control may need review and escalation redesign. This lets modernization become strategic rather than reactive.

The CCPFM scoring framework therefore converts the model from theory into practice. It identifies domains, assigns severity, accounts for policy context, adjusts for interaction effects and warning signs, distinguishes types of risk, and requires narrative findings. Its purpose is not to produce a final number for its own sake. Its purpose is to make policy system risk visible, comparable, and correctable. A legacy policy system cannot be modernized until the agency knows where and how it is failing.

VIII. CAUSAL PATHWAYS AND INTERACTION EFFECTS

The CCPFM is not only a checklist of policy weaknesses. It is a causal model. Its central claim is that compliance centered police policy failure emerges from the interaction of multiple structural, cognitive, linguistic, instructional, supervisory, digital, and corrective mechanisms. A Directive system may contain an isolated defect that can be corrected through ordinary revision. The deeper risk appears when defects combine. Fragmentation increases cognitive load. Linguistic ambiguity increases interpretive variability. Passive dissemination leaves misunderstanding undetected. Weak supervision allows drift to persist. Digital completion records create a false appearance of implementation. When these conditions interact, the policy system may produce operational inconsistency even while appearing administratively complete.

The first causal pathway runs from decentralized production to structural fragmentation. Municipal police Directives are often drafted, revised, inherited, imported, amended, and maintained by multiple actors over time. Command Staff, legal advisors, accreditation managers, specialized Units, Supervisors, committees, vendors, and prior administrations may each shape different parts of the system. Fragmented Policy Systems argued that this production model predictably generates redundancy, contradiction, drift, layering, and misalignment when no centralized authority owns system wide coherence (Bremer, 2024a). Organizational theory supports this pathway because differentiated functions require integration mechanisms when their outputs are interdependent (Lawrence & Lorsch, 1967; Thompson, 1967). The causal point is direct: decentralized contribution without architectural control produces fragmentation.

The second causal pathway runs from structural fragmentation to the compliance coherence gap. A fragmented system may still satisfy formal compliance review because required policy

topics exist. The agency may have a use of force Directive, a body worn camera Directive, a reporting Directive, a supervisory review Directive, an internal affairs Directive, and a training Directive. Each may appear complete when reviewed separately. The failure appears when the Directives are read together and their definitions, thresholds, duties, reporting sequences, and review requirements do not align. Public administration scholarship distinguishes coordination, coherence, and integration, which supports the CCPFM's position that policy presence does not prove system coherence (Cejudo & Michel, 2017; Trein et al., 2019).

The third causal pathway runs from fragmentation to linguistic instability. When Directives are written by different authors across time, obligation language often becomes inconsistent. One Directive may state that an Officer must act. Another may state that the Officer should act. A related form may imply the action is optional. A training bulletin may use different terminology. From Language to Action argued that modal verbs operate as decision triggers because they communicate obligation, discretion, and expected practice (Bremer, 2024b). When those signals are unstable across a fragmented architecture, personnel cannot reliably determine whether the agency has imposed a mandatory duty, permitted discretion, or expressed a preferred practice.

The fourth causal pathway runs from linguistic instability to interpretive variability. When must, may, should, shall, when feasible, as appropriate, or if possible are used inconsistently, Officers and Supervisors must supply meaning. That meaning may come from training memory, field norms, local practice, Supervisor preference, prior experience, or individual judgment. Legal interpretation and drafting authorities recognize that obligation and permission language carry substantive interpretive consequences (Office of the Federal Register, 2017; Scalia & Garner, 2012; Tiersma, 1999). In policing, the consequence is operational. Unstable language produces unstable perceived obligation. Officers facing similar facts may reasonably derive different conclusions from the same Directive language.

The fifth causal pathway runs from fragmentation and linguistic instability to Policy Cognitive Load. Cognitive Load in Police Policy argued that policy complexity, ambiguity, structural inconsistency, information density, redundancy, and cross reference dependency increase cognitive burden during Directive interpretation and application (Bremer, 2025b). Cognitive Load Theory explains that working memory is limited when processing novel or interacting information and that poorly designed instructional materials increase extraneous cognitive load (Paas et al., 2003; Sweller, 1988; Sweller et al., 1998). A fragmented and linguistically unstable Directive system forces Officers to interpret the system while also managing the operational encounter. The Directive becomes an additional cognitive task rather than a decision aid.

The sixth causal pathway runs from Policy Cognitive Load to degraded recognition primed decision making. Officers often make decisions under time pressure, uncertainty, and incomplete information. Recognition Primed Decision Making theory explains that experienced personnel rely on pattern recognition, stored schemas, and rapid mental simulation rather than slow comparative analysis in such environments (Klein, 1998, 2008). If the Directive system cannot be internalized into stable schemas, recognition based decision making is weakened. The Officer may hesitate, misclassify the situation, omit a duty, substitute a heuristic, or rely on local practice. Policy failure therefore occurs not only because the Officer did not know the policy, but because the policy system did not become a usable cognitive model.

The seventh causal pathway runs from cognitive degradation to policy fidelity loss. Policy fidelity means the degree to which field conduct aligns with the intended meaning of the Directive. When comprehension is incomplete, recall is weak, decision signals are unstable, and schemas are fragmented, field conduct begins to drift away from formal policy. Street level bureaucracy

scholarship explains that frontline actors adapt formal rules under practical constraints (Lipsky, 1980; Maynard-Moody & Musheno, 2003). The CCPFM adds that policy architecture can induce some of that adaptation by making formal guidance difficult to use. In this pathway, policy as written separates from policy as practiced.

The eighth causal pathway runs from passive dissemination to implementation opacity. Policy Without Comprehension argued that many agencies distribute Directives through email, policy portals, electronic acknowledgment, LMS completion, or limited roll call notification without validating comprehension (Bremer, 2025c). This creates opacity because the agency can prove exposure but not operational understanding. Retrieval practice research demonstrates that active recall and practice testing improve durable learning more effectively than passive review (Dunlosky et al., 2013; Roediger & Karpicke, 2006). Training evaluation literature similarly distinguishes delivery from learning, transfer, behavior, and results (Arthur et al., 2003; Kirkpatrick & Kirkpatrick, 2006). Passive dissemination therefore leaves the core implementation question unanswered.

The ninth causal pathway runs from implementation opacity to supervisory drift. Supervisors are supposed to detect whether policy is being applied correctly in the field. But if Supervisors are not given clear review duties, stable criteria, comprehension data, escalation triggers, or correction requirements, they may reinforce policy inconsistently or fail to identify drift. Legacy Police Policy Systems as Evidence argued that a policy system is incomplete when it states Officer duties without defining supervisory review, correction, training referral, discipline, and revision mechanisms (Bremer, 2026b). Police accountability scholarship supports this because supervision is central to controlling discretion and maintaining organizational accountability (Mastrofski, 2004; Walker & Archbold, 2018).

The tenth causal pathway runs from supervisory drift to feedback failure. A functioning policy system should learn from complaints, internal affairs findings, use of force reviews, pursuit reviews, body worn camera audits, training failures, legal updates, lawsuits, and Supervisor identified confusion. Organizational learning theory distinguishes surface correction from deeper learning that changes the underlying system (Argyris & Schön, 1978; Senge, 1990). If warning signs remain isolated in complaint files, training records, audit reports, or digital dashboards, the agency may correct individual events without correcting the system. Feedback failure allows policy weakness to persist and reproduce.

The eleventh causal pathway runs from digital completion tracking to amplified passivity. Digital systems can support implementation, but they can also make weak implementation appear organized. Digitized Compliance argued that PowerDMS and similar platforms are legally neutral but operationally consequential infrastructure that can either document disciplined implementation or preserve passive completion (Bremer, n.d.). A platform may show assignments, acknowledgments, reminders, standards mapping, dashboards, and archived versions. Those records may prove administrative activity. They do not necessarily prove training, comprehension, supervision, correction, or revision. Implementation science supports this distinction because adoption of a system does not establish implementation fidelity (Durlak & DuPre, 2008; Fixsen et al., 2005; Nilsen, 2015).

The twelfth causal pathway runs from warning signs to legal and evidentiary risk. Policy weakness becomes more serious when the agency has notice that the system may not be functioning. Warning signs may include repeated complaints, use of force review deficiencies, pursuit crashes, body camera audit failures, suppression rulings, internal affairs patterns, training failures, legal updates, or repeated Supervisor identified confusion. Legacy Police

Policy Systems as Evidence argued that the policy system may become probative when it shows that the agency failed to train, supervise, discipline, correct, or revise in response to foreseeable risk (Bremer, 2026b). Municipal liability doctrine remains legally restrained, but policy system evidence may matter when connected to notice, fault, and causation (Board of County Commissioners v. Brown, 1997; City of Canton v. Harris, 1989; Connick v. Thompson, 2011; Monell v. Department of Social Services, 1978).

These pathways should not be understood as strictly linear in every case. The model is directional, but the system is dynamic. Fragmentation may increase cognitive load. Cognitive load may cause misapplication. Misapplication may generate supervisory review. Weak supervisory review may fail to correct the underlying policy defect. Digital records may then show that the policy was acknowledged but not retrained. Complaints may accumulate. The same Directive may then be revised through additional layering, increasing future fragmentation. The system loops. Failure does not always move once through the chain. It can recycle through maintenance, revision, training, supervision, and digital documentation.

This is why interaction effects are central to the CCPFM. An interaction effect occurs when weakness in one domain increases the risk created by another domain. A linguistically unstable Directive is more dangerous when passively disseminated. A fragmented policy cluster is more dangerous when Supervisors lack review criteria. A cognitively dense Directive is more dangerous when the digital record shows only acknowledgment. A missing feedback loop is more dangerous when prior warning signs exist. The CCPFM does not treat each weakness as equal in isolation. It evaluates how weaknesses combine.

One important interaction effect is the fragmentation load interaction. Fragmentation forces the user to reconcile related Directives, and reconciliation consumes cognitive resources. If a use of force Directive, body worn camera Directive, reporting Directive, and supervisory review Directive use different triggers, the Officer and Supervisor must mentally integrate them. That integration task becomes part of the operational workload. Under stress, the burden may produce omission, delay, or inconsistent application. This interaction connects structural architecture directly to human performance (Bremer, 2024a; Bremer, 2025b; Paas et al., 2003).

A second interaction effect is the language supervision interaction. Unstable modal verbs affect not only Officer conduct, but also supervisory review. If the Directive does not clearly state whether conduct was mandatory, discretionary, or expected, Supervisors may reach different conclusions about similar events. That inconsistency can weaken discipline, corrective counseling, training referral, and pattern detection. The issue is not only that the Officer may misunderstand the Directive. The issue is that the organization may be unable to evaluate conduct consistently after the event (Bremer, 2024b; Bremer, 2026b).

A third interaction effect is the passive dissemination digital completion interaction. Acknowledgment only implementation is weak in any format. Digital systems can make it appear stronger because the records are cleaner, more searchable, more timestamped, and easier to report. A command staff dashboard may show high completion rates, creating confidence that implementation occurred. But if no comprehension checks, training links, Supervisor alerts, or remedial assignments exist, the platform has documented exposure rather than competence. The digital system amplifies the appearance of implementation while leaving implementation opacity intact (Bremer, 2025c; Bremer, n.d.).

A fourth interaction effect is the warning sign feedback interaction. A policy weakness before notice may be a prospective risk. The same weakness after repeated warning signs becomes

more significant. If complaints, audits, or incidents show recurring confusion, the system should respond with revision, retraining, supervisory correction, or discipline where appropriate. If the agency does not respond, the failure becomes persistent. Systems theory supports the importance of weak signal detection because latent conditions often remain dangerous when organizations normalize them or fail to correct them (Reason, 1990; Vaughan, 1996). The CCPFM therefore treats warning signs as risk multipliers.

A fifth interaction effect is the training architecture interaction. Training cannot fully compensate for unstable policy architecture. A training unit may simplify policy into usable guidance, but if that simplified guidance differs from the written Directive, a policy training misalignment is created. Officers may learn one operational rule while the manual states another. Supervisors may review based on the manual, while Officers act based on training. Internal affairs may evaluate under a different understanding. This interaction shows why policy and training must be built together rather than sequentially. Training is not an afterthought to policy. It is part of the implementation architecture (Bremer, 2025a; Bremer, 2025c; Baldwin & Ford, 1988).

A sixth interaction effect is the legal sufficiency usability interaction. A Directive may be written to satisfy legal and accreditation requirements but become operationally difficult to apply because it contains too many qualifications, cross references, factors, exceptions, and procedural layers. The agency may improve legal completeness while reducing cognitive usability. Administrative burden and implementation scholarship support the idea that additional requirements can increase friction and reduce effective implementation when not integrated into usable systems (Herd & Moynihan, 2019; Pressman & Wildavsky, 1973). The CCPFM therefore evaluates whether legal sufficiency has been achieved at the cost of operational usability.

The CCPFM's causal pathways explain why risk scoring must consider both domain severity and domain interaction. A single domain score may understate risk if several domains reinforce one another. For example, a use of force Directive cluster might receive a moderate score for fragmentation, a moderate score for modal instability, a moderate score for cognitive load, and a moderate score for passive dissemination. Each score alone might suggest repairable weakness. Together, they may indicate a high risk implementation environment. The model's interaction logic prevents reviewers from treating related weaknesses as separate minor issues.

The causal pathways also explain why policy modernization must begin at the correct point. If the primary failure is structural fragmentation, adding a quiz will not solve the problem. If the primary failure is passive dissemination, editing the modal verbs will not fully solve the problem. If the primary failure is supervisory drift, uploading the Directive into a platform will not solve the problem. If the primary failure is a missing feedback loop, collecting acknowledgments will not solve the problem. Corrective action must match the causal mechanism. Diagnosis precedes repair.

The model also supports a prospective approach to risk. Agencies do not need to wait for a constitutional injury, lawsuit, or DOJ investigation to detect policy system weakness. If the Directives are fragmented, language is unstable, cognitive load is high, training is passive, supervision is unstructured, digital records prove only completion, and feedback loops are weak, the agency already has observable risk conditions. The CCPFM allows those conditions to be identified before the visible failure occurs.

The ultimate causal insight is that compliance centered policy failure is emergent. It arises from the structure of the system, the way the system communicates, the cognitive demands it imposes, the weakness of its implementation, the inconsistency of its supervision, the limits of

its digital records, and the failure of its feedback loops. No single component explains the whole failure. The pattern emerges from interaction. That is why the CCPFM is a model rather than a list. It identifies how the parts combine to produce risk.

IX. APPLYING CCPFM TO LEGACY MUNICIPAL POLICE POLICY SYSTEMS

The CCPFM should be applied first at the system level and then at the policy cluster level. A system level review evaluates whether the agency's entire Directive architecture is organized around coherence, cognitive usability, training integration, supervisory control, digital implementation, and corrective feedback. A cluster level review evaluates whether related Directives governing a specific high liability subject operate together as one functional decision system. This two level approach is necessary because legacy policy systems often appear manageable when individual Directives are reviewed separately, while the deeper failure emerges when the related Directives, forms, training records, supervisory practices, and digital records are analyzed together.

A system level review begins by identifying the agency's policy architecture. The reviewer should determine how Directives are organized, who owns policy coherence, how revisions occur, whether definitions are controlled, whether modal language is standardized, whether related Directives are cross checked, whether training is connected to policy revision, whether Supervisors have defined review duties, and whether warning signs trigger policy review. Instructional Systems Failure Theory established that policy architecture is an independent causal variable, not neutral background text (Bremer, 2025a). The system level review therefore asks whether the agency has a policy architecture or merely a policy collection.

A cluster level review then applies the CCPFM to high liability operational subjects. A policy cluster is a group of related Directives, forms, training materials, supervisory practices, digital assignments, and review records that govern one operational decision area. Common clusters include use of force, vehicle pursuits, search and seizure, custody and prisoner handling, body worn camera use, mental health response, domestic violence response, duty to intervene, internal affairs, supervisory review, and training. These clusters should receive priority because they involve recurring constitutional, safety, evidentiary, and liability risk. *City of Canton v. Harris* (1989) is relevant because police agencies know Officers will repeatedly face constitutional decision points requiring adequate preparation.

A use of force cluster illustrates the method. The reviewer should not examine only the use of force Directive. The reviewer should compare the use of force Directive with the body worn camera Directive, medical aid Directive, reporting Directive, supervisory response Directive, internal affairs Directive, duty to intervene Directive, de escalation training, force review forms, digital acknowledgment records, remedial training files, and prior force review findings. The question is whether those materials operate as one coherent system. If the use of force Directive requires immediate Supervisor notification, but the reporting Directive uses a different trigger, the body worn camera Directive uses a different event category, and the Supervisor checklist omits the key review factor, the cluster is fragmented even if each document appears adequate alone (Bremer, 2024a).

The use of force cluster should then be evaluated for linguistic decision signals. The reviewer should determine whether the Directive distinguishes mandatory duties, prohibited conduct, permitted discretion, and expected practices. Force Directives often use terms such as reasonable, necessary, proportional, imminent, feasible, active resistance, threat, de escalation, intervention, and medical aid. Those terms must be defined or operationalized sufficiently to

guide field decision making and supervisory review. From Language to Action established that modal verbs and obligation language function as decision triggers in police policy (Bremer, 2024b). A use of force cluster that uses must, should, may, and when feasible inconsistently creates interpretive risk at the highest liability point in the policy system.

The use of force cluster should also be evaluated for Policy Cognitive Load. The reviewer should ask whether the Directives create usable decision pathways or require Officers and Supervisors to process dense, fragmented, and cross referenced requirements under stress. A force encounter may already require the Officer to process threat, distance, subject behavior, civilian presence, partner location, communication, legal authority, and tactical options. The Directive should reduce unnecessary uncertainty by making decision points visible. Cognitive Load in Police Policy established that policy complexity, ambiguity, structural inconsistency, density, and redundancy can degrade comprehension, recall, schema activation, and field application (Bremer, 2025b). The reviewer should therefore evaluate whether the cluster is cognitively usable, not merely whether it is comprehensive.

The same use of force cluster should be reviewed for instructional implementation. The agency should be able to show that material revisions were trained, that Officers completed more than acknowledgment, that scenario based exercises tested application, that Supervisors reinforced the standard, and that remedial training occurred after misunderstanding or violation. Policy Without Comprehension established that passive dissemination verifies exposure without proving comprehension (Bremer, 2025c). A force Directive assigned through electronic acknowledgment without training, retrieval practice, scenario application, or Supervisor reinforcement would score poorly in instructional implementation even if the text were legally adequate.

The vehicle pursuit cluster provides a second example. A pursuit policy system should align initiation criteria, termination standards, Supervisor authority, communications, emergency vehicle operations, road and weather factors, offense severity, third party risk, documentation, post pursuit review, crash response, discipline, and retraining. A common legacy weakness is that one Directive states when an Officer may initiate a pursuit, another discusses emergency vehicle operation, a form requires documentation of factors not listed in the Directive, and Supervisor termination authority is unclear or scattered across sections. The CCPFM reviewer should identify whether Officers and Supervisors receive one coherent decision pathway or a collection of related but misaligned rules.

The pursuit cluster is especially useful for testing decision trigger clarity. Pursuit decisions often occur under extreme time compression, and the Officer must rapidly determine whether initiation or continuation is permitted, restricted, or prohibited. The Directive should clearly distinguish mandatory termination criteria from discretionary balancing factors. It should define when Supervisors must take command, when they must order termination, and what facts must be documented. If the policy relies on broad language such as when appropriate, if safe, or when circumstances warrant without defining operational thresholds, the agency shifts interpretive burden to Officers and Supervisors at the most dangerous moment. That is a linguistic and cognitive risk under the CCPFM.

A search and seizure cluster provides a third example. The reviewer should compare Directives governing investigative detention, arrest, consent searches, search incident to arrest, vehicle searches, inventory searches, plain view, warrant service, body worn camera use, report writing, evidence handling, supervisory review, and training. Search and seizure policy often fails when it lists legal concepts without converting them into operational decision structure. Officers may

know terms such as reasonable suspicion or probable cause but still lack a clear policy pathway for documenting facts, seeking consent, preserving evidence, or obtaining supervisory review when recurring errors appear. The CCPFM reviewer should determine whether the cluster teaches and reinforces legal thresholds or merely names them.

The custody and prisoner handling cluster should be evaluated similarly. Related Directives may govern transport, search of prisoners, medical screening, suicide risk, restraint, use of force, property handling, observation, documentation, and Supervisor notification. Fragmentation in this cluster can create serious operational and legal risk because duties often overlap. A prisoner handling Directive may require medical attention, a use of force Directive may require medical aid after force, a transport Directive may require observation, and a detention Directive may impose separate documentation duties. If these rules are not aligned, Officers may miss duties or Supervisors may review inconsistently. The CCPFM forces the reviewer to test the cluster as one system.

A body worn camera cluster is especially useful for identifying the difference between policy presence and policy function. Agencies often have a body worn camera Directive, but the operational system also includes use of force review, complaint investigation, evidence retention, report writing, supervisory audit, discipline, training, and public records procedures. If the activation rule is unclear, exceptions are broad, documentation of nonactivation is inconsistent, Supervisors do not audit compliance, and repeated failures do not trigger retraining, the agency may have a body worn camera policy without a functioning body worn camera governance system. The CCPFM would identify that as a combined linguistic, supervisory, instructional, digital, and feedback failure.

The internal affairs and supervisory review clusters should also be examined because they determine whether the agency learns from its own operations. Internal affairs Directives should connect complaint intake, classification, investigation, findings, discipline, policy review, training referral, pattern analysis, and command notification. Supervisory review Directives should connect field events to correction and escalation. Legacy Police Policy Systems as Evidence emphasized that complaint patterns, weak discipline, and failure to correct may become legally significant when they show that the agency ignored recurring risk (Bremer, 2026b). The CCPFM therefore treats internal affairs and supervisory review as policy implementation mechanisms, not merely accountability procedures.

The autonomous vehicle sufficiency paper provides an example of prospective CCPFM thinking. That paper argued that autonomous vehicles create foreseeable operational issues because they may commit traffic violations, obstruct emergency operations, become involved in crashes, or contain relevant digital evidence without a human driver present (Bremer, 2026d). The sufficiency rationale identified necessary Directive components: legal authority, definitions, recognition procedures, enforcement procedures, remote operator communication, malfunction and hazard response, emergency scene management, crash response, evidence handling, documentation, supervisory responsibilities, training, audit, and policy review. This is precisely the kind of prospective design logic the CCPFM encourages. Emerging policy areas should be built around foreseeable decisions before Officers are forced to improvise.

The autonomous vehicle example also shows that the CCPFM is not only retrospective. It can be used to diagnose legacy failure, but it can also be used to design new Directives. A new policy should be evaluated before issuance for architecture, coherence, language stability, cognitive usability, training implementation, supervisory control, digital documentation, and feedback loops. If the policy is designed with these domains in mind, the agency is less likely to

create another legacy system. This is a major practical value of the model. It can be used as both a failure diagnosis tool and a policy sufficiency design framework.

Applying the CCPFM also requires evidence collection. The reviewer should not rely only on the manual. The review should include current and prior Directive versions, related forms, training lesson plans, PowerDMS or other platform records, acknowledgment histories, quiz or test results, roll call materials, supervisory review forms, audit results, complaint patterns, internal affairs findings, body worn camera reviews, use of force reviews, pursuit reviews, remedial training records, legal update notices, accreditation proofs, and revision histories. The model is designed to evaluate the policy system as it actually operates, not only the policy text as it appears in the manual.

The reviewer should then score each domain within each cluster. For example, a use of force cluster may receive a 2 in policy architecture, 3 in structural fragmentation, 2 in linguistic decision signals, 3 in Policy Cognitive Load, 4 in instructional implementation, 3 in supervisory control, 2 in digital implementation, and 4 in corrective feedback. That pattern would show that the greatest weakness is not merely policy text. It is implementation and feedback. A pursuit cluster might score highest in linguistic decision signals and supervisory control if termination authority and Supervisor duties are unclear. The domain scores direct the corrective response.

Corrective action should follow the diagnosed mechanism. If the use of force cluster is fragmented, the agency should align related Directives, forms, training, and review processes. If the pursuit cluster has modal instability, the agency should rewrite obligation language and decision triggers. If the body worn camera cluster has passive implementation, the agency should add comprehension validation, Supervisor audits, and remedial training. If the internal affairs cluster has feedback failure, the agency should connect complaint patterns to policy review and training. The CCPFM helps agencies avoid generic reform. It directs reform to the causal weakness.

The CCPFM should also be applied over time. A single review gives the agency a baseline. Subsequent reviews can determine whether modernization reduced risk. Agencies can compare cluster scores before and after revision, training, digital configuration, and supervisory reform. This makes policy modernization measurable. The agency can demonstrate not merely that it revised Directives, but that it reduced fragmentation, clarified language, lowered cognitive load, improved comprehension validation, strengthened supervision, and connected feedback to revision.

The model also supports comparative assessment across agencies. Researchers, consultants, accreditation reviewers, or municipal oversight bodies could use the CCPFM to compare how different agencies structure high liability Directive clusters. The comparison should not be used to create simplistic rankings. Its value is diagnostic. One agency may have stronger policy architecture but weaker training implementation. Another may have strong digital records but weak supervisory control. Comparative assessment can identify common failure patterns and help agencies learn from one another.

Applying the CCPFM therefore changes the nature of police policy review. The review no longer asks only whether the agency has a policy. It asks whether the policy cluster functions as an integrated legal decision system. It does not stop with text. It follows the Directive into training, supervision, digital records, field review, correction, and revision. It does not assume that compliance means function. It tests function. That is the practical contribution of the model.

X. LEGAL, OPERATIONAL, AND ADMINISTRATIVE USES OF THE MODEL

The CCPFM is designed for practical use. It is not only a theoretical explanation of compliance centered policy failure. It is a diagnostic framework that can be used by police agencies, policy consultants, Training Functions, accreditation managers, municipal officials, legal advisors, risk managers, plaintiff experts, defense experts, and researchers. Its value lies in its ability to separate policy presence from policy function, identify the specific domain of failure, and connect observed weaknesses to corrective action. The model therefore serves legal, operational, administrative, training, accreditation, digital governance, and modernization purposes.

The first use is legal risk analysis. The CCPFM can help determine whether a policy system supports or undermines claims of training adequacy, supervisory control, policy implementation, and correction after notice. It does not determine municipal liability. That remains a legal question governed by *Monell, City of Canton, Connick, Brown*, and related doctrine. Municipal liability requires proof of municipal fault and causation, not merely proof that a policy could have been better written (*Board of County Commissioners v. Brown*, 1997; *City of Canton v. Harris*, 1989; *Connick v. Thompson*, 2011; *Monell v. Department of Social Services*, 1978). The CCPFM's legal value is narrower. It helps identify whether the agency's policy system created evidence of function or evidence of weakness.

For defense use, the CCPFM can help an agency demonstrate that its policy system was more than a manual. A strong CCPFM profile would show current law, coherent architecture, controlled obligation language, manageable cognitive load, meaningful training, validated comprehension, supervisory review, corrective action, digital implementation proof, and revision after warning signs. *Legacy Police Policy Systems as Evidence* argued that a policy system is legally safer when it can show that Directives were current, coherent, trained, understood, supervised, enforced, corrected, and revised when necessary (Bremer, 2026b). A defense expert could use the CCPFM to explain that the agency maintained a functioning constitutional control system rather than relying on paper compliance.

For plaintiff or critical incident review use, the CCPFM can help identify whether policy presence masks policy function failure. A plaintiff expert or outside reviewer might use the model to determine whether the agency relied on outdated language, fragmented Directives, passive dissemination, weak supervision, digital acknowledgment, or failure to correct after warning signs. *Beck v. City of Pittsburgh* (1996) and *Estate of Roman v. City of Newark* (2019) illustrate why complaint patterns, weak discipline, failure to train, failure to supervise, and failure to correct can become relevant to municipal liability theories. The CCPFM does not decide whether those theories succeed. It provides a structured method for examining whether the policy system contributed to the alleged failure.

The model can also support municipal risk management. Municipal officials and risk managers often see policy issues after lawsuits, complaints, insurance concerns, consent decrees, or public controversy. The CCPFM allows those officials to ask more precise questions. The issue is not only whether the police department has a policy. The issue is whether the policy system is coherent, trained, supervised, digitally implemented, and corrected when warning signs appear. This matters because municipal risk is not limited to litigation. It includes operational harm, public trust loss, insurance exposure, poor audit findings, repeated complaints, and reduced organizational legitimacy.

Operationally, the CCPFM gives Command Staff a way to prioritize modernization. Police executives often inherit large manuals and limited time. Without a diagnostic framework, modernization can become reactive: revise the policy that caused the last problem, update the section the auditor flagged, or add language after a lawsuit. The CCPFM allows Command Staff to prioritize high liability clusters based on risk. A use of force cluster with severe fragmentation, passive training, and weak supervisory review should be addressed before a low risk administrative Directive with minor drafting issues. This makes modernization strategic rather than merely responsive.

The model is also useful for policy writers and policy consultants. A policy writer using the CCPFM would not merely draft a legally sufficient Directive. The writer would test the Directive against diagnostic domains. Does it align with related Directives? Does it use controlled modal language? Does it reduce unnecessary cognitive burden? Does it identify training requirements? Does it assign Supervisor duties? Does it create review and feedback triggers? Does it produce digital records of implementation? This turns policy writing into policy architecture. It also reduces the risk of producing Directives that look complete but fail as operational decision systems.

The CCPFM can support Training Functions by identifying which Directives require deeper implementation. Policy Without Comprehension argued that passive dissemination verifies exposure rather than comprehension, and learning science shows that retrieval practice, distributed practice, and scenario application improve durable retention (Bremer, 2025c; Dunlosky et al., 2013; Roediger & Karpicke, 2006). A Training Function can use CCPFM scoring to determine which Directives require knowledge checks, scenario based application, roll call reinforcement, field training integration, or remedial instruction. Training can then be tied to risk rather than convenience.

The model also supports supervision. Supervisors need clear review duties and standards. A CCPFM review can identify whether Directives tell Supervisors what to review, what to document, what to correct, when to escalate, when to refer for training, and when to identify policy problems. Police accountability scholarship recognizes the importance of supervision in controlling discretion and maintaining accountability (Mastrofski, 2004; Walker & Archbold, 2018). The CCPFM helps agencies move from assumed supervision to designed supervision. It asks whether supervisory control is built into the Directive system.

For accreditation managers, the CCPFM can supplement standards mapping with coherence and implementation review. Accreditation can improve discipline, structure, and professional expectations. But the fragmentation paper argued that standards compliance does not necessarily prove cross Directive coherence (Bremer, 2024a). Public administration scholarship similarly distinguishes policy coordination, coherence, and integration (Cejudo & Michel, 2017; Trein et al., 2019). Accreditation managers can use the CCPFM to ask whether proofs of compliance are connected to policy coherence, training, supervision, and correction. This makes accreditation more operationally meaningful.

The model is particularly useful in digital policy environments. Digitized Compliance argued that PowerDMS and similar platforms can support implementation or amplify passive completion depending on agency use (Bremer, n.d.). The CCPFM can guide digital platform configuration. Instead of using a platform mainly to assign Directives and collect acknowledgments, the agency can configure it to classify material revisions, assign training, deliver comprehension checks, alert Supervisors, track remediation, document policy review after warning signs, and preserve implementation evidence. Implementation science supports this use because tools

must be embedded within competency, organization, leadership, and feedback systems to produce outcomes (Durlak & DuPre, 2008; Fixsen et al., 2005; Nilsen, 2015).

The CCPFM also supports internal audits. An internal audit can use the model to review whether a high liability policy cluster is functioning. For example, an audit of the vehicle pursuit cluster would examine the pursuit Directive, emergency vehicle operations policy, Supervisor authority, communication requirements, report forms, crash review records, training records, digital acknowledgments, remedial training, and revision history. The audit would then score each CCPFM domain and identify corrective actions. This is more useful than asking only whether the pursuit policy exists and was reviewed on schedule.

The model can also guide after action review. After a critical incident, an agency should not ask only whether the Officer complied with policy. It should also ask whether the policy system supported proper decision making. Was the Directive clear? Was the decision trigger visible? Was the duty trained? Was the policy cognitively usable under the conditions faced? Did Supervisors have clear review duties? Did prior warning signs exist? Did the digital record show meaningful implementation? Reason's work on human error supports this broader inquiry because visible errors often reflect latent system conditions (Reason, 1990, 2000). The CCPFM gives agencies a structured method to conduct that inquiry.

The model also has research value. Researchers can use CCPFM domains to study whether policy system characteristics correlate with operational outcomes, complaints, use of force review deficiencies, pursuit crashes, body worn camera failures, internal affairs findings, training failures, or litigation patterns. This would allow future empirical testing of the theory. Cognitive Load Theory, implementation science, and systems theory already support the model's conceptual foundation, but empirical research could refine weighting, scoring, and predictive validity (Fixsen et al., 2005; Paas et al., 2003; Reason, 1990; Sweller, 1988).

CCPFM can also assist with emerging policy areas. The autonomous vehicle sufficiency paper shows how a new Directive can be built prospectively around foreseeable risks, legal authority, definitions, operational procedures, remote communication, evidence handling, supervisory responsibilities, training, audit, and review (Bremer, 2026d). The CCPFM can be used before a new policy is issued to prevent it from becoming a future legacy problem. The agency can ask whether the new Directive is coherent, cognitively usable, trainable, supervised, digitally supported, and feedback capable from the beginning.

For municipal leadership, the CCPFM provides a language for governance. Policy modernization is often difficult to explain because the problem is not always visible. A manual may look professional. A digital platform may show completion. Accreditation may show standards alignment. The CCPFM gives leaders a way to explain why these visible indicators are not enough. It identifies modernization as a system design issue rather than a formatting or document management project. This helps justify investment in policy architecture, training, supervision, and digital implementation.

The model also helps avoid overcorrection. Without a diagnostic model, agencies may respond to failure by adding more rules, more documentation, more approvals, and more acknowledgments. The CCPFM asks whether those additions reduce or increase system risk. If the issue is cognitive overload, adding more language may worsen the problem. If the issue is passive dissemination, adding another acknowledgment may not help. If the issue is supervisory drift, adding text without supervisory duties will not correct the failure. The model directs the agency toward the right corrective mechanism.

The CCPFM is therefore useful because it aligns diagnosis with remediation. A policy architecture failure calls for system redesign. A linguistic decision signal failure calls for controlled modal language. A cognitive load failure calls for simplification, sequencing, and decision pathway design. An instructional failure calls for comprehension validation and scenario application. A supervisory failure calls for review duties, escalation triggers, and correction protocols. A digital implementation failure calls for platform reconfiguration. A feedback failure calls for organizational learning loops. The model does not merely identify risk. It points to the corrective pathway.

The practical result is a stronger policy system. A police agency that applies the CCPFM should be better able to show that its Directives are current, coherent, understandable, trained, supervised, digitally implemented, and corrected. It should also be better able to identify weaknesses before those weaknesses become incidents. The model helps shift police policy from a compliance file to an operational governance system. That is the purpose of the CCPFM: to make the failure visible while it can still be corrected.

XI. LIMITS OF THE CCPFM

The CCPFM is a diagnostic model, not a liability formula. It identifies policy system risk conditions, but it does not determine whether a municipality is legally liable for a constitutional injury. Municipal liability under Section 1983 requires legal elements that remain outside the model's scoring framework, including municipal fault, causation, notice where required, and a sufficient connection between the municipal policy, custom, practice, or omission and the alleged injury (*Board of County Commissioners v. Brown*, 1997; *City of Canton v. Harris*, 1989; *Connick v. Thompson*, 2011; *Monell v. Department of Social Services*, 1978). A high CCPFM score may identify serious policy system vulnerability, but it does not by itself establish deliberate indifference, moving force causation, or constitutional violation.

This limitation is important because the model is intended to strengthen analysis rather than overstate it. A fragmented Directive system may be operationally weak without being legally actionable. A confusing policy may need revision without causing the incident under review. Passive dissemination may be poor implementation without proving municipal fault. Digital acknowledgment may be incomplete evidence of training without showing deliberate indifference. The CCPFM helps identify those weaknesses, but legal conclusions require additional facts, doctrine, causation analysis, and court specific application. The model should therefore be used as a structured diagnostic tool, not as a substitute for legal judgment.

The CCPFM also does not eliminate individual responsibility. Officers remain responsible for lawful conduct, compliance with Directives, truthful reporting, proper use of force, constitutional searches, appropriate care of persons in custody, and adherence to supervisory commands. Supervisors remain responsible for review, correction, documentation, escalation, and discipline where appropriate. The model does not excuse misconduct by attributing every failure to the policy system. Instead, it distinguishes between individual misconduct that occurs despite a functioning policy system and operational inconsistency made more likely by a weak policy system. That distinction is essential to fair analysis.

The model also does not claim that policy architecture is the only cause of police failure. Culture, leadership, staffing, resources, local politics, community conditions, field supervision, discipline, equipment, labor relations, training quality, and individual conduct may all influence outcomes. Instructional Systems Failure Theory expressly recognizes that policy architecture is

one important structural variable among others, not the sole cause of policing outcomes (Bremer, 2025a). The CCPFM therefore should not be used to reduce complex organizational failure to policy text alone. Its contribution is narrower: it identifies policy system design as a measurable and often underexamined source of operational risk.

The model's scoring system also requires professional judgment. Some indicators are relatively objective. A reviewer can determine whether a Directive contains a definition, whether a policy was acknowledged, whether a knowledge check exists, whether a Supervisor review form includes a required field, or whether a platform record shows training linkage. Other indicators require expert analysis. Cognitive usability, policy coherence, decision pathway clarity, modal stability, and interaction effects cannot always be measured mechanically. Human factors scholarship recognizes that system usability and workload require structured but context sensitive evaluation (Norman, 2013; Wickens et al., 2015). The CCPFM provides a framework for disciplined judgment, not automated certainty.

The model is also limited by available evidence. A reviewer may not have access to all relevant Directives, historical versions, training records, digital logs, internal affairs files, body worn camera audits, complaint histories, supervisory notes, or command communications. Incomplete records may prevent full scoring. A low apparent risk score may reflect missing evidence rather than actual system strength. Conversely, a high score based on limited records should be framed as preliminary unless supported by broader review. The CCPFM depends on the quality and completeness of the materials examined.

Another limitation concerns agency variation. Municipal police agencies differ in size, resources, legal environment, accreditation status, digital infrastructure, training capacity, supervision model, labor structure, and operational workload. A large agency with specialized training and policy staff may implement CCPFM recommendations differently from a small agency with limited administrative capacity. The model is intended to be scalable, but its application must be proportionate. A small agency may not need the same implementation apparatus as a large metropolitan agency, but it still needs coherent Directives, clear obligation language, training proportionate to risk, supervisory control, and corrective feedback.

The CCPFM also requires careful use in accreditation contexts. The model does not reject accreditation. Accreditation can improve professional structure, require written guidance, establish review discipline, and support external accountability. The model's claim is narrower: standards compliance does not necessarily prove system coherence, cognitive usability, comprehension, supervision, or feedback. Therefore, accreditation should be supplemented by CCPFM review, not replaced by it. A policy may satisfy a standard while still scoring poorly in structural coherence or instructional implementation. The model helps identify that gap without treating accreditation as valueless.

Digital implementation analysis has similar limits. The CCPFM does not treat PowerDMS or any other platform as inherently deficient. Digitized Compliance argued that digital platforms are legally neutral but operationally consequential infrastructure that can support strong implementation or amplify passive completion depending on agency use (Bremer, n.d.). The model should therefore avoid vendor centered conclusions. The diagnostic question is not whether the agency uses a particular platform. The question is whether the platform record proves meaningful implementation, including training linkage, comprehension validation, supervisory follow up, remediation, revision history, and response to warning signs.

The model also does not assume that every Directive requires the same implementation depth. A uniform appearance update, parking procedure, administrative form change, or equipment inventory requirement does not require the same training and comprehension validation as a use of force revision, pursuit policy change, duty to intervene requirement, search and seizure update, body worn camera rule, custody procedure, or mental health response Directive. Risk based implementation is central to the CCPFM. Overapplication of the model could create unnecessary burden if agencies treat every Directive as high liability. The model should be used to allocate attention based on risk.

The scoring framework also should not become another compliance artifact. The purpose of scoring is diagnosis, not box checking. An agency could misuse the CCPFM by completing a scoring form without engaging in meaningful analysis, just as an agency can misuse digital policy platforms by collecting acknowledgments without validating comprehension. To avoid that problem, every score should be supported by narrative findings, cited evidence, and corrective recommendations. The model's value lies in explaining how the system functions or fails, not in producing a number for administrative comfort.

Another limitation is empirical validation. The CCPFM is grounded in a synthesis of legal doctrine, policy analysis, cognitive science, training research, implementation science, systems theory, and subordinate mechanism papers. That foundation is strong conceptually. However, the model has not yet been empirically validated across a large sample of agencies. Future research should test whether higher CCPFM scores correlate with operational indicators such as use of force review deficiencies, pursuit crashes, complaint patterns, internal affairs findings, body worn camera failures, training failures, Supervisor correction patterns, litigation outcomes, or DOJ findings. Empirical testing could refine domain weights, scoring thresholds, and predictive validity.

The model also should be applied with caution in after action reviews. After a serious incident, there is a natural tendency to search for policy defects that explain the outcome. That can produce hindsight bias. A reviewer should not assume that because a bad outcome occurred, the policy system caused it. The CCPFM should be applied by identifying pre incident conditions, available records, actual warning signs, and the relationship between policy design and the decision at issue. Reason's systems approach supports examining latent conditions, but it does not justify assuming causation from outcome alone (Reason, 1990, 2000).

The CCPFM's proper use is therefore disciplined and bounded. It identifies system risk. It supports policy modernization. It helps prioritize reform. It clarifies the difference between policy presence and policy function. It helps agencies see whether Directives are coherent, usable, trained, supervised, digitally supported, and feedback capable. It may inform legal, expert, administrative, and operational analysis. But it does not replace doctrine, evidence, professional judgment, or fact specific causation analysis.

The limitations strengthen rather than weaken the model. By defining what the CCPFM does not do, the model becomes more credible in what it does. It does not claim automatic liability. It does not excuse misconduct. It does not blame software. It does not dismiss accreditation. It does not pretend policy architecture is the only variable in policing. It identifies policy system risk in a structured way. That is its contribution.

XII. IMPLICATIONS FOR POLICY MODERNIZATION

The CCPFM changes what modernization means. A legacy policy system is not modernized merely because the manual has been updated, uploaded into a digital platform, mapped to accreditation standards, or assigned for electronic acknowledgment. Those actions may improve administration, but they do not necessarily improve policy function. Modernization, under the CCPFM, means replacing compliance centered policy architecture with human centered legal decision architecture. The agency must be able to show that its Directives are coherent, cognitively usable, linguistically controlled, training integrated, supervision connected, digitally supported, feedback driven, and revision capable.

The first implication is that modernization must begin with architecture, not digitization. Digitization can improve access, version control, distribution, acknowledgment tracking, and reporting. But uploading a fragmented, linguistically unstable, cognitively dense, and passively implemented policy system into software does not correct the underlying failure. Digitized Compliance argued that PowerDMS and similar systems can support disciplined implementation or amplify weak policy culture depending on how the agency uses them (Bremer, n.d.). Therefore, the first modernization question is not which platform stores the Directives. The first question is whether the Directives form a coherent legal decision system.

The second implication is that agencies should establish centralized policy architecture governance. Decentralized contribution is unavoidable because Command Staff, legal advisors, accreditation personnel, Training Function personnel, Supervisors, specialized Units, and digital platform administrators all possess relevant expertise. But decentralized contribution should not mean decentralized architecture. Fragmented Policy Systems showed that distributed authorship, ownership, revision, and maintenance without centralized coherence control predictably generate fragmentation (Bremer, 2024a). Organizational theory supports the same point because differentiated functions require integration mechanisms when their outputs are interdependent (Lawrence & Lorsch, 1967; Thompson, 1967). A modernized policy system should therefore include a defined policy architecture owner responsible for system coherence.

The third implication is that the agency should conduct a system wide architecture audit before rewriting individual Directives. An agency should identify policy clusters, related Directives, duplicated duties, conflicting thresholds, outdated provisions, inconsistent definitions, uneven supervisory responsibilities, mismatched forms, training gaps, and digital records that prove only completion. This audit should not be limited to the manual. It should include forms, lesson plans, roll call bulletins, digital assignments, supervisory review checklists, internal affairs procedures, accreditation proofs, audit findings, complaint patterns, and revision histories. The point is to map the real operating system, not merely the official table of contents.

The fourth implication is that agencies should prioritize high liability clusters. Modernization should begin where policy failure is most likely to affect constitutional rights, bodily integrity, evidence integrity, public safety, public legitimacy, or litigation exposure. High liability clusters include use of force, vehicle pursuits, search and seizure, custody and prisoner handling, body worn camera use, mental health response, domestic violence response, duty to intervene, internal affairs, supervisory review, and training. *City of Canton v. Harris* (1989) recognizes that agencies know Officers will face recurring constitutional decision points. The CCPFM extends that logic by requiring policy modernization to focus first on Directives that govern foreseeable high risk decisions.

The fifth implication is that agencies should adopt controlled obligation language across the entire Directive system. Must should mean mandatory. Must not should mean prohibited. May should mean permitted discretion. Should should mean expected practice that allows justified

deviation. Qualifiers such as when feasible, when practical, if possible, or as appropriate should be defined when used in high liability Directives. From Language to Action argued that modal verbs function as decision triggers because they communicate obligation and discretion at the point of action (Bremer, 2024b). Legal drafting authorities similarly caution that unclear modal language can create ambiguity (Office of the Federal Register, 2017; Scalia & Garner, 2012; Tiersma, 1999). A modernized Directive system should not allow obligation language to drift by author, Unit, or historical habit.

The sixth implication is that agencies should rewrite Directives around operational decision pathways. Legacy Directives often accumulate legal standards, procedural rules, exceptions, reporting duties, and supervisory expectations without clear sequencing. A human centered legal decision system should organize Directives around the actual decision path: what is prohibited, what is mandatory, what is permitted, what is expected, what triggers Supervisor notification, what must be documented, what review follows, and what correction occurs when the rule is misunderstood or violated. Policy as a Cognitive System argued that operational policies shape perception, role assignment, communication, prioritization, and action under stress (Bremer, 2026a). A modernized Directive should therefore function as decision architecture, not as an archive of accumulated requirements.

The seventh implication is that agencies should reduce unnecessary Policy Cognitive Load. Police work is already cognitively demanding. Directives should not add avoidable burden through dense text, excessive cross references, nested exceptions, inconsistent terminology, unprioritized factors, and unclear decision triggers. Cognitive Load in Police Policy argued that policy complexity, ambiguity, structural inconsistency, information density, and redundancy can degrade comprehension, recall, schema activation, and field application (Bremer, 2025b). Cognitive Load Theory supports this because poorly designed instructional materials increase extraneous cognitive load and impair performance (Paas et al., 2003; Sweller, 1988; Sweller et al., 1998). Modernization should therefore treat cognitive usability as a policy quality requirement.

The eighth implication is that policy and training should be designed together. A Directive should not be completed first and handed to the Training Function afterward as a finished document. Training should help shape the Directive's decision points, terminology, examples, scenarios, and comprehension checks. Policy Without Comprehension argued that Directives must become operational knowledge rather than administrative artifacts (Bremer, 2025c). Training transfer research supports this because learning must transfer into workplace behavior, and transfer depends on training design and work environment reinforcement (Baldwin & Ford, 1988; Blume et al., 2010). A modernized policy system should therefore require training review before adoption of high liability Directives.

The ninth implication is that agencies should replace acknowledgment only implementation with risk based comprehension validation. Not every Directive requires the same implementation depth. Low risk administrative updates may require only acknowledgment. Material revisions to high liability Directives should require training, retrieval practice, scenario based application, Supervisor reinforcement, and remediation where needed. Retrieval practice research shows that active recall and practice testing improve durable retention more effectively than passive review (Dunlosky et al., 2013; Roediger & Karpicke, 2006). A modernized implementation system should classify Directives by risk and match training depth to consequence.

The tenth implication is that supervisory control should be built into high liability Directives. Supervisory duties should not be assumed by rank or title. The Directive should state what

Supervisors must review, what standard they must apply, what they must document, when they must correct, when they must escalate, and when they must refer an issue for retraining, discipline, audit, or policy revision. Legacy Police Policy Systems as Evidence argued that a policy system becomes incomplete when it states Officer duties without assigning the supervisory mechanisms needed to make the rule function (Bremer, 2026b). Police accountability literature supports the importance of supervision as a mechanism for controlling discretion and maintaining accountability (Mastrofski, 2004; Walker & Archbold, 2018).

The eleventh implication is that agencies should configure digital platforms around implementation proof. Digital systems should not be used only to assign Directives and collect acknowledgments. They should be configured to identify material revisions, link Directives to training, assign comprehension checks, notify Supervisors, document remediation, preserve version control, track policy review cycles, and connect warning signs to corrective workflows. Implementation science reinforces this requirement because adoption of a tool does not prove fidelity of use (Durlak & DuPre, 2008; Fixsen et al., 2005; Nilsen, 2015). A modern digital record should prove the life of the Directive, not merely its distribution.

The twelfth implication is that agencies should build formal corrective feedback loops. Complaints, internal affairs findings, use of force reviews, pursuit reviews, body worn camera audits, report deficiencies, legal updates, suppression rulings, lawsuits, training failures, and Supervisor identified confusion should trigger policy review where appropriate. Organizational learning theory supports this because meaningful learning requires changing the system that produced the error, not merely correcting surface symptoms (Argyris & Schön, 1978; Senge, 1990). Systems theory similarly shows that latent conditions persist when organizations fail to detect and correct weak signals (Perrow, 1984; Reason, 1990). A modernized policy system should treat warning signs as policy system data.

The thirteenth implication is that modernization should distinguish isolated repair from architectural replacement. Some policy problems can be corrected through targeted revision. A missing definition can be added. An outdated citation can be updated. An unclear reporting trigger can be clarified. But when the agency has accumulated fragmentation, inconsistent language, weak training integration, passive dissemination, supervisory silence, digital completion dependence, and poor feedback loops, isolated editing may not be enough. Instructional Systems Failure Theory identified compliance accretion and Policy Architecture Drift as mechanisms through which legacy systems become structurally maladaptive (Bremer, 2025a). At that point, the agency may need architectural replacement rather than another patch.

The fourteenth implication is that agencies should use CCPFM scoring to guide modernization sequencing. The model allows an agency to identify which domains and policy clusters require immediate attention. A cluster with critical risk in instructional implementation and corrective feedback may need training and supervision reform before textual editing alone. A cluster with high structural fragmentation may need architectural consolidation before knowledge checks are useful. A cluster with digital completion dependence may need platform reconfiguration. This prevents modernization from becoming a general preference for cleaner writing. It makes modernization evidence based and risk driven.

The fifteenth implication is that modernization should produce evidence of function. A modernized policy system should allow the agency to show that a Directive was legally grounded, coherent with related Directives, written with controlled obligation language, cognitively usable, trained, comprehension validated, supervised, corrected, digitally documented, and revised when warning signs appeared. This evidence has operational and

legal value. It improves internal control, supports training transfer, improves supervisory consistency, strengthens corrective learning, and may help the agency show that it maintained a functioning policy implementation system when challenged (Bremer, 2026b; City of Canton v. Harris, 1989; Monell v. Department of Social Services, 1978).

The sixteenth implication is that new policy areas should be designed through CCPFM principles from the beginning. The autonomous vehicle sufficiency paper illustrates this approach by identifying foreseeable operational issues and building a Directive rationale around legal authority, definitions, operational procedures, remote communication, emergency response, evidence handling, documentation, supervisory responsibilities, training, audit, and review (Bremer, 2026d). Emerging areas such as autonomous vehicles, drones, artificial intelligence tools, facial recognition, digital evidence platforms, and automated enforcement should not be added to legacy architectures without first designing them as human centered legal decision systems.

The final implication is that policy modernization is governance modernization. A Directive system is not simply a set of documents. It is a system for translating law into action, action into review, review into correction, and correction into organizational learning. A legacy system may prove that rules exist. A modern system should prove that rules function. The CCPFM gives agencies a way to move from one condition to the other. It turns modernization into a structured process of diagnosing system risk, rebuilding decision architecture, validating comprehension, strengthening supervision, configuring digital implementation, and closing feedback loops before failure becomes visible in the field.

XIII. CONCLUSION

This paper introduced the Compliance Centered Policy Failure Model as a diagnostic and explanatory framework for evaluating structural, cognitive, linguistic, instructional, supervisory, digital, and corrective risk within municipal police policy systems. The central claim is that legacy policy failure is not primarily a missing policy problem. Many agencies already possess extensive manuals, digital platforms, accreditation proofs, acknowledgment records, training files, review cycles, and archived versions. The deeper problem is that these systems may prove compliance while failing to function as coherent legal decision systems for Officers and Supervisors operating under stress.

The CCPFM builds on the integrated findings of the supporting mechanism papers and the prior synthesis paper. Instructional Systems Failure Theory established that municipal police Directives are often designed as compliance artifacts while being used operationally as human centered instructional decision systems (Bremer, 2025a). Fragmented Policy Systems showed how decentralized drafting produces redundancy, contradiction, drift, layering, and misalignment across related Directives (Bremer, 2024a). From Language to Action showed that modal verbs and obligation language operate as decision triggers that shape perceived duty and discretion (Bremer, 2024b). Cognitive Load in Police Policy showed how policy complexity, ambiguity, density, redundancy, and structural inconsistency degrade comprehension and recognition based decision making under operational conditions (Bremer, 2025b). Policy Without Comprehension showed that passive dissemination verifies exposure without proving comprehension, retention, retrieval, or application (Bremer, 2025c). Digitized Compliance showed that digital platforms can support implementation or amplify passive completion depending on agency use (Bremer, n.d.). Legacy Police Policy Systems as Evidence showed how policy systems may become evidence of what an agency knew, trained, supervised,

corrected, or ignored (Bremer, 2026b). The synthesis paper connected these mechanisms into one system level account of compliance centered policy failure (Bremer, 2026c).

The contribution of this paper is to convert that synthesis into a model. The CCPFM does not merely describe policy weakness. It identifies diagnostic domains, observable indicators, scoring logic, causal pathways, interaction effects, use cases, limits, and modernization implications. The model evaluates eight domains: policy architecture, structural fragmentation, linguistic decision signals, Policy Cognitive Load, instructional implementation, supervisory control, digital implementation, and corrective feedback. These domains allow reviewers to identify where a policy system is failing and why the failure matters. They also prevent a single strength, such as digital documentation or legal currency, from concealing weakness in another area, such as comprehension validation or supervisory correction.

The CCPFM's central theoretical contribution is that municipal police policy failure should be understood as an emergent property of system design. A fragmented Directive system creates incoherent guidance. Unstable modal language weakens decision signals. Excessive Policy Cognitive Load makes the Directive difficult to process and retrieve under stress. Passive dissemination leaves comprehension unverified. Weak supervision allows drift to persist. Digital completion tracking may document administrative activity without proving implementation. Failed feedback loops allow warning signs to remain isolated rather than returning to policy, training, supervision, and revision. These mechanisms interact. The system fails not because one paragraph is imperfect, but because the architecture, language, training, supervision, technology, and feedback structure are misaligned.

The model also clarifies why traditional policy review is insufficient. A conventional review may confirm that a Directive exists, that it is legally current, that it contains required language, that it has been distributed, and that personnel acknowledged it. Those findings matter, but they do not establish policy function. The CCPFM asks different questions. Does the Directive system operate coherently across related policies? Does the language create stable obligation signals? Can Officers retrieve and apply the rule under stress? Was the Directive trained and comprehension validated? Do Supervisors know what to review, document, correct, and escalate? Does the digital platform prove implementation or merely completion? Do warning signs trigger revision, retraining, and organizational learning? These are the questions that determine whether policy functions as operational governance.

The model remains legally restrained. It does not claim that a high risk score proves municipal liability. It does not replace Monell, City of Canton, Connick, Brown, or other governing doctrine. Municipal liability requires legal proof of municipal fault, causation, notice where required, and a connection between the municipal policy, custom, practice, or omission and the alleged constitutional injury (Board of County Commissioners v. Brown, 1997; City of Canton v. Harris, 1989; Connick v. Thompson, 2011; Monell v. Department of Social Services, 1978). The CCPFM identifies policy system risk. It may inform legal analysis, but it does not decide legal conclusions.

The model also does not excuse individual misconduct. Officers remain responsible for lawful conduct. Supervisors remain responsible for meaningful review and correction. Command Staff remain responsible for governance. The CCPFM does not shift all responsibility from people to systems. It clarifies that individual behavior occurs inside organizational architecture. A functioning agency must address both individual misconduct and system conditions that make misapplication more likely. This distinction is essential because repeated field failures should not be explained only through individual deficiency when the policy environment itself may be

fragmented, ambiguous, cognitively burdensome, passively implemented, and weakly supervised.

The practical value of the CCPFM is that it turns policy modernization into a diagnosable process. Agencies can use the model to audit high liability policy clusters, score risk domains, identify interaction effects, prioritize remediation, and track improvement over time. A use of force cluster may require architectural integration. A pursuit cluster may require clearer decision triggers and Supervisor authority. A body worn camera cluster may require better supervisory audits and corrective feedback. A search and seizure cluster may require scenario based training and comprehension validation. A digital platform may require reconfiguration so that it documents training, testing, Supervisor alerts, remediation, and revision rather than only acknowledgment. The model connects diagnosis to corrective action.

The CCPFM also helps agencies avoid false modernization. A legacy policy system is not modernized merely because it is uploaded into a digital platform. It is not modernized merely because personnel acknowledge it electronically. It is not modernized merely because it is mapped to accreditation standards. It is not modernized merely because it has a recent revision date. Modernization requires architecture. It requires coherent Directives, controlled obligation language, cognitively usable decision pathways, risk based implementation, comprehension validation, designed supervision, digital implementation support, and corrective feedback loops. The agency must prove function, not only presence.

The model further supports prospective policy design. Emerging issues such as autonomous vehicles, drones, artificial intelligence tools, facial recognition, digital evidence platforms, automated enforcement, and remote operator systems should not be added to legacy policy architectures without first applying CCPFM principles. The autonomous vehicle sufficiency paper demonstrates that new Directives should begin with foreseeable operational risks, legal authority, definitions, communication requirements, evidence handling, supervisory duties, training, audit, and review (Bremer, 2026d). The CCPFM allows agencies to design new policy areas correctly before they become the next layer of compliance accretion.

Future research should refine and test the model. Empirical research should examine whether higher CCPFM scores correlate with complaint patterns, use of force review deficiencies, pursuit crashes, body worn camera failures, internal affairs findings, training failures, Supervisor correction patterns, litigation outcomes, or DOJ findings. Additional research should test domain weighting, scoring reliability, interrater agreement, and the effectiveness of CCPFM guided modernization. The model is theoretically grounded, but empirical development would strengthen its value as a research, audit, and policy modernization tool.

The final conclusion is direct. Municipal police policy failure is a system design problem that can be diagnosed. Agencies do not need only more Directives. They need better policy architecture. They need Directives that are legally grounded, coherent, cognitively usable, linguistically controlled, training integrated, comprehension validated, supervision connected, digitally supported, feedback driven, and revision capable. The future of police policy reform is not the better management of manuals. It is the construction and measurement of human centered legal decision systems before failure becomes visible in the field.

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APPENDIX A

CCPFM Diagnostic Scoring Instrument

Purpose

The Compliance Centered Policy Failure Model Diagnostic Scoring Instrument is designed to evaluate whether a municipal police policy system functions as a coherent, cognitively usable, legally grounded, training integrated, supervision connected, digitally supported, and feedback driven legal decision system. The instrument is not intended to determine municipal liability, predict a constitutional violation, or replace legal analysis. It is a structured diagnostic tool for identifying policy system risk, prioritizing modernization, and documenting whether a legacy Directive system proves policy function or merely policy presence.

Unit of Review

The preferred unit of review is the policy cluster, not the isolated Directive. A policy cluster includes the primary Directive, related Directives, forms, training materials, digital assignment records, supervisory review forms, internal affairs procedures, audit findings, complaint patterns, revision histories, and any other records that affect how the policy is understood, applied, supervised, corrected, or revised.

High liability policy clusters should be reviewed first. These include:

- Use of Force
- Vehicle Pursuits
- Search and Seizure
- Arrest and Detention
- Custody and Prisoner Handling
- Mental Health Response
- Domestic Violence Response
- Duty to Intervene
- Body Worn Camera Use
- Internal Affairs
- Supervisory Review
- Training and Policy Implementation

Scoring Scale

Each CCPFM domain should be scored from 0 to 4.

0 = No meaningful risk identified.

The domain appears coherent, controlled, documented, and functioning. No material defect is identified based on the available record.

1 = Low risk.

An isolated weakness exists, but it is limited, correctable, and not presently connected to a broader policy system failure.

2 = Moderate risk.

The weakness appears more than once, affects a meaningful part of the policy cluster, or suggests recurring weakness that should be corrected before it becomes normalized.

3 = High risk.

The weakness affects a high liability policy area, substantially impairs policy coherence, training, supervision, implementation, or correction, or creates significant operational uncertainty.

4 = Critical risk.

The weakness is systemic, affects high liability decision making, is connected to known warning signs, or remains uncorrected despite evidence that the policy system is not functioning.

Domain 1: Policy Architecture

Diagnostic Question:

Does the policy cluster operate as a coherent legal decision architecture, or is it merely a collection of related documents?

Indicators to Review:

- Whether related Directives are organized around a clear decision pathway.
- Whether definitions are consistent across related Directives.
- Whether Officer duties, Supervisor duties, documentation duties, and training requirements align.
- Whether related forms match the controlling Directive.
- Whether the policy hierarchy is clear.
- Whether the agency has an identifiable policy architecture owner.
- Whether revision history shows coordinated policy system maintenance.

Scoring Guidance:

0 = The cluster is coherent, integrated, and organized around clear legal and operational decision pathways.

1 = Minor structural weakness exists, but the Directive cluster remains coherent.

2 = Multiple organizational weaknesses exist, but they do not fully destabilize the cluster.

3 = The cluster contains serious architectural weakness that affects high liability policy function.

4 = The cluster is structurally incoherent, lacks ownership, and creates substantial operational uncertainty.

Domain 2: Structural Fragmentation

Diagnostic Question:

Do related Directives produce one consistent operational answer, or do they create redundancy, contradiction, drift, layering, or misalignment?

Indicators to Review:

- Duplicate rules expressed differently.
- Conflicting thresholds across Directives.
- Different revision dates for related policies that should have been updated together.
- Accumulated add ons that were never integrated.
- Forms, checklists, or training bulletins that differ from the Directive.
- Inconsistent supervisory duties across related policies.
- Related Directives that require the Officer or Supervisor to reconcile the policy system during or after the event.

Scoring Guidance:

0 = No meaningful fragmentation identified.

1 = Minor duplication or inconsistency exists, but it is isolated.

2 = Moderate fragmentation exists across related Directives.

3 = Fragmentation affects a high liability cluster and creates meaningful operational uncertainty.

4 = Fragmentation is systemic and produces inconsistent formal guidance across the policy system.

Domain 3: Linguistic Decision Signals

Diagnostic Question:

Does the Directive use controlled obligation language that clearly distinguishes mandatory duties, prohibitions, permitted discretion, and expected practice?

Indicators to Review:

- Consistent use of must for mandatory duties.
- Consistent use of must not for prohibitions.
- Consistent use of may for permitted discretion.
- Consistent use of should for expected practice with justified deviation.
- Avoidance of uncontrolled shall, will, when feasible, as appropriate, and if possible.
- Defined qualifiers in high liability Directives.
- Clear actor responsibility.
- Clear separation between rules, factors, exceptions, and documentation duties.

Scoring Guidance:

0 = Obligation language is controlled, consistent, and operationally clear.

1 = Minor modal inconsistency exists, but the duty remains clear.

2 = Repeated instability exists in obligation language or qualifiers.

3 = Modal instability affects high liability duties and supervisory review.

4 = Language fails to communicate stable obligation, discretion, or prohibition, producing serious decision signal failure.

Domain 4: Policy Cognitive Load

Diagnostic Question:

Can Officers and Supervisors understand, retrieve, and apply the Directive under operational stress without unnecessary cognitive burden?

Indicators to Review:

- Dense or overly legalistic paragraphs.
- Multiple nested conditions or exceptions.
- Excessive cross references.
- Unprioritized lists of factors.
- Unclear decision thresholds.
- High information density.
- Inconsistent sequencing.
- Lack of visible decision triggers.
- Training materials that simplify the policy differently than the written Directive.

Scoring Guidance:

0 = The Directive is cognitively usable and organized for field application.

1 = Minor cognitive burden exists, but the Directive remains usable.

2 = Moderate cognitive burden exists and should be reduced.

3 = The Directive is difficult to process, train, or apply in a high liability setting.

4 = The Directive imposes severe cognitive burden likely to degrade comprehension, recall, or decision making under stress.

Domain 5: Instructional Implementation

Diagnostic Question:

Did the agency validate that personnel understood, retained, and could operationally apply the Directive, or did the agency merely distribute it?

Indicators to Review:

- Whether the Directive was trained after issuance or material revision.
- Whether knowledge checks were used.
- Whether scenario based application was used.
- Whether retrieval practice or spaced reinforcement occurred.
- Whether remedial training was assigned after misunderstanding.
- Whether the Training Function aligned lesson plans with the Directive.
- Whether training records show learning, not merely attendance or acknowledgment.
- Whether implementation depth matches policy risk.

Scoring Guidance:

0 = The Directive was trained, reinforced, comprehension validated, and remediated where necessary.

1 = Minor implementation gap exists, but learning was meaningfully supported.

2 = Implementation relied partly on passive dissemination but included some training or reinforcement.

3 = High liability Directive was distributed with weak comprehension validation.

4 = The agency relied almost entirely on passive dissemination, acknowledgment, or completion tracking despite high risk or warning signs.

Domain 6: Supervisory Control

Diagnostic Question:

Does the Directive assign Supervisors meaningful review, documentation, correction, escalation, and feedback duties?

Indicators to Review:

- Required Supervisor response.
- Required Supervisor review criteria.
- Required documentation of review.
- Required correction or counseling.
- Training referral triggers.
- Command notification triggers.
- Pattern detection requirements.
- Audit responsibilities.
- Connection between Supervisor review and policy or training revision.

Scoring Guidance:

0 = Supervisory control is clearly designed, assigned, documented, and connected to correction.

1 = Minor supervisory duty weakness exists, but review remains functional.

2 = Supervisory duties are incomplete or inconsistently documented.

3 = High liability Directive lacks meaningful supervisory control or correction mechanisms.

4 = Supervisory control is absent, assumed, or disconnected from known warning signs and recurring risk.

Domain 7: Digital Implementation

Diagnostic Question:

Does the digital policy system prove implementation, or does it mainly prove assignment, acknowledgment, and completion?

Indicators to Review:

- Version control.
- Material revision identification.
- Training linkage.
- Comprehension checks.
- Supervisor alerts.
- Remedial assignments.
- Overdue escalation.
- Policy review workflows.
- Audit trails.
- Revision after warning signs.
- Whether digital records show policy function or only administrative activity.

Scoring Guidance:

0 = Digital system documents meaningful implementation and corrective follow through.

1 = Minor digital documentation weakness exists.

2 = Digital record shows more than acknowledgment, but implementation proof is incomplete.

3 = Digital system is used mostly for assignment, acknowledgment, and dashboard completion.

4 = Digital record preserves clear evidence of passive completion despite high liability risk or warning signs.

Domain 8: Corrective Feedback

Diagnostic Question:

Do warning signs feed back into policy review, training, supervision, discipline, audit, and revision?

Indicators to Review:

- Complaints.
- Internal affairs findings.
- Use of force reviews.
- Pursuit reviews.
- Body worn camera audits.
- Report deficiencies.
- Suppression rulings.
- Lawsuits.
- Legal updates.
- Training failures.
- Supervisor identified confusion.
- Whether these warning signs triggered policy review, retraining, correction, discipline where appropriate, or revision.

Scoring Guidance:

0 = Warning signs reliably trigger policy, training, supervision, and corrective review.

1 = Minor feedback weakness exists, but the agency generally responds to warning signs.

2 = Feedback occurs inconsistently or informally.

3 = Warning signs exist but are not reliably connected to correction or revision.

4 = Warning signs are repeated, documented, and uncorrected, showing serious feedback failure.

CCPFM Domain Scoring Table

Policy Cluster Reviewed:

Date of Review:

Reviewer:

Documents Reviewed:

Policy Architecture: 0 1 2 3 4

Structural Fragmentation: 0 1 2 3 4

Linguistic Decision Signals: 0 1 2 3 4

Policy Cognitive Load: 0 1 2 3 4

Instructional Implementation: 0 1 2 3 4

Supervisory Control: 0 1 2 3 4

Digital Implementation: 0 1 2 3 4

Corrective Feedback: 0 1 2 3 4

Total Score:

Risk Band:

Aggregate Risk Bands

0 to 7 = Low System Risk

The policy cluster appears generally coherent, usable, trained, supervised, and correctable. Any weaknesses are isolated and correctable through ordinary revision or administrative follow up.

8 to 15 = Moderate System Risk

The policy cluster contains meaningful weaknesses that should be corrected before they become normalized. The system is not failing, but several risk indicators are present.

16 to 23 = Elevated System Risk

The policy cluster contains recurring weaknesses that may affect implementation, supervision, comprehension, or decision making. Corrective action should be prioritized.

24 to 31 = High System Risk

The policy cluster shows serious system weakness. The agency should consider architectural revision, training redesign, supervisory control reform, digital implementation changes, and feedback loop correction.

32 = Critical Legacy System Risk

The policy cluster reflects systemic failure across all CCPFM domains. Immediate architectural replacement and command level corrective action should be considered.

Interaction Modifier

A reviewer should consider raising the risk band by one level when three or more domains score 2 or higher within the same high liability policy cluster.

A reviewer should consider treating the cluster as high or critical risk when two or more domains score 3 or higher and warning signs are present.

A reviewer should document the interaction effect in narrative form.

Warning Sign Modifier

The risk level should be elevated when the agency has notice that the policy system may not be functioning. Warning signs include:

- Repeated complaints.
- Repeated use of force review deficiencies.
- Pursuit crashes or near misses.
- Body worn camera audit failures.
- Suppression rulings.
- Lawsuits.
- Internal affairs patterns.
- Training failures.
- Repeated documentation errors.
- Supervisor identified confusion.
- Legal changes not followed by training or revision.
- Digital noncompletion or repeated late acknowledgment patterns.

Narrative Finding Requirement

Each score should include a narrative finding. The narrative should identify:

- The evidence reviewed.
- The specific weakness found.
- The CCPFM domain affected.
- Whether the weakness is isolated, recurring, or systemic.
- Whether the weakness affects a high liability decision point.
- Whether warning signs are present.
- The interaction effect, if any.
- The recommended corrective action.

Recommended Corrective Action Categories

Architectural Revision:

Used when Directives are misaligned, fragmented, contradictory, layered, or structurally incoherent.

Language Revision:

Used when modal verbs, qualifiers, terminology, hierarchy, or responsibility language are unstable.

Cognitive Usability Revision:

Used when the Directive is too dense, complex, cross referenced, or difficult to apply under stress.

Training and Comprehension Reform:

Used when the agency relies on passive dissemination, acknowledgment, or completion without validating understanding.

Supervisory Control Reform:

Used when Supervisor duties, review criteria, correction duties, escalation triggers, or documentation requirements are missing or weak.

Digital Configuration Reform:

Used when the digital system documents completion but does not support training linkage, comprehension checks, Supervisor alerts, remediation, or revision workflows.

Corrective Feedback Reform:

Used when complaints, audits, reviews, lawsuits, training failures, or legal changes do not trigger policy review, retraining, supervision, discipline where appropriate, or revision.

Architectural Replacement:

Used when the cluster shows systemic weakness across multiple domains and cannot be adequately corrected through isolated editing.

Final Diagnostic Statement Template

Based on the CCPFM review, the [policy cluster name] cluster received a total score of [score], placing it in the [risk band] category. The primary risk domains are [domains]. The evidence indicates that the policy cluster [does or does not] function as a coherent, cognitively usable, training integrated, supervision connected, digitally supported, and feedback driven legal decision system. The most significant corrective need is [corrective category]. The recommended corrective action is [specific action].

APPENDIX B

High Liability Policy Cluster Review Template

Purpose

The High Liability Policy Cluster Review Template is designed to help agencies apply the Compliance Centered Policy Failure Model to policy areas that present recurring constitutional, operational, supervisory, evidentiary, or liability risk. The template is intended for use by Command Staff, policy writers, accreditation managers, Training Function personnel, Supervisors, legal advisors, internal affairs personnel, risk managers, consultants, and outside reviewers.

This template should not be used to determine municipal liability. It is a structured review tool for identifying whether a high liability policy cluster functions as a coherent, cognitively usable, training integrated, supervision connected, digitally supported, and feedback driven legal decision system.

Policy Cluster Identification

Agency:

Policy Cluster Reviewed:

Date of Review:

Reviewer:

Review Type:

- Initial CCPFM review
- Annual policy cluster review
- Post incident review
- Post litigation review
- Accreditation support review
- Training revision review
- Digital implementation review
- Corrective action review
- Other:

Policy Cluster Category

Select the applicable policy cluster:

- Use of Force
- Vehicle Pursuits
- Search and Seizure
- Arrest and Detention
- Custody and Prisoner Handling
- Mental Health Response

- Domestic Violence Response
- Duty to Intervene
- Body Worn Camera Use
- Internal Affairs
- Supervisory Review
- Training and Policy Implementation
- Autonomous Vehicle Operations and Enforcement
- Drone Operations
- Facial Recognition
- Digital Evidence
- Other:

Documents and Records Reviewed

Primary Directive:

Related Directives:

Forms:

Training Materials:

Lesson Plans:

Roll Call Materials:

Digital Platform Records:

Electronic Acknowledgment Records:

Knowledge Checks or Tests:

Scenario Training Records:

Supervisor Review Forms:

Internal Affairs Records:

Complaint Records:

Audit Findings:

Use of Force Reviews:

Pursuit Reviews:

Body Worn Camera Audits:

Crash Reports:

Suppression Rulings:

Litigation Records:

Legal Update Notices:

Accreditation Proofs:

Revision History:

Other Records:

Part I: Policy Architecture Review

Review Question:

Does the policy cluster operate as one coherent legal decision system?

Review Prompts:

- Are all related Directives identified?
- Are related Directives organized around the same operational decision pathway?
- Are definitions consistent across the cluster?
- Are Officer duties, Supervisor duties, training duties, documentation duties, and review duties aligned?
- Are forms and checklists consistent with the Directives?
- Are training materials consistent with the Directives?
- Are digital assignments linked to the correct policy version?
- Is there a clear policy owner or architecture owner?
- Are material revisions coordinated across related Directives?

Findings:

Risk Indicators Identified:

- No risk identified
- Related Directives are missing
- Definitions differ across Directives
- Related Directives have inconsistent revision dates
- Forms do not match Directives
- Training materials do not match Directives
- Digital assignments do not match current policy version
- No clear architecture owner
- Other:

Score:

0 1 2 3 4

Recommended Corrective Action:

Part II: Structural Fragmentation Review

Review Question:

Do related Directives create redundancy, contradiction, drift, layering, or misalignment?

Review Prompts:

- Does the same rule appear in multiple places?
- Is the rule expressed differently across Directives?
- Do related Directives create conflicting duties?
- Are old provisions retained after new revisions?
- Were new requirements added without structural integration?
- Do Officer duties and Supervisor duties align?
- Do documentation triggers align across the cluster?
- Do review procedures align with the primary Directive?

Findings:

Risk Indicators Identified:

- No risk identified
- Redundancy
- Contradiction
- Drift
- Layering
- Misalignment
- Conflicting forms or checklists
- Conflicting training guidance
- Other:

Score:

0 1 2 3 4

Recommended Corrective Action:

Part III: Linguistic Decision Signal Review

Review Question:

Does the policy cluster use controlled obligation language that clearly communicates what is mandatory, prohibited, permitted, and expected?

Review Prompts:

- Is must used only for mandatory duties?
- Is must not used only for prohibitions?
- Is may used only for permitted discretion?

- Is should used only for expected practice with justified deviation?
- Is shall avoided or tightly controlled?
- Are qualifiers such as when feasible, if possible, and as appropriate defined?
- Are actors clearly identified?
- Are passive constructions avoided when assigning duties?
- Are rules, exceptions, factors, and documentation duties separated?

Findings:

Risk Indicators Identified:

- No risk identified
- Inconsistent modal verbs
- Uncontrolled use of shall
- Undefined qualifiers
- Passive responsibility language
- Unclear actor
- Vague threshold
- Rules and factors mixed together
- Exceptions not separated from rule
- Other:

Score:

0 1 2 3 4

Recommended Corrective Action:

Part IV: Policy Cognitive Load Review

Review Question:

Can personnel understand, retrieve, and apply the policy cluster under operational stress without unnecessary cognitive burden?

Review Prompts:

- Are decision points visible?
- Are prohibitions, mandatory duties, discretionary authority, and expected practices separated?
- Are paragraphs concise enough for comprehension?
- Are cross references necessary and limited?
- Are exceptions clearly organized?
- Are terms stable and repeated consistently?
- Does the Directive avoid unnecessary legalistic density?
- Can the rule be converted into training scenarios?
- Can Supervisors use the policy as a review standard?

Findings:

Risk Indicators Identified:

- No risk identified
- Dense text
- Excessive cross references
- Multiple nested exceptions
- Unprioritized factors
- Unclear sequence
- High information density
- Lack of visible decision triggers
- Difficult to train
- Difficult to supervise
- Other:

Score:

0 1 2 3 4

Recommended Corrective Action:

Part V: Instructional Implementation Review

Review Question:

Did the agency train and validate operational understanding, or did it only distribute the Directive?

Review Prompts:

- Was the Directive trained after issuance?
- Was the Directive trained after material revision?
- Were knowledge checks used?
- Were scenario exercises used?
- Was retrieval practice used?
- Was periodic reinforcement used?
- Were Supervisors briefed on reinforcement expectations?
- Were misunderstandings identified and corrected?
- Were remedial assignments documented?
- Is implementation depth proportional to risk?

Findings:

Risk Indicators Identified:

- No risk identified
- Email only distribution
- Policy portal posting only
- Electronic acknowledgment only

- LMS completion without knowledge check
- No scenario application
- No retrieval practice
- No remediation records
- No training after material revision
- No risk based implementation category
- Other:

Score:

0 1 2 3 4

Recommended Corrective Action:

Part VI: Supervisory Control Review

Review Question:

Does the policy cluster assign Supervisors meaningful review, documentation, correction, escalation, and feedback duties?

Review Prompts:

- Are Supervisor response duties identified?
- Are Supervisor review standards identified?
- Are documentation requirements identified?
- Are correction duties identified?
- Are training referral triggers identified?
- Are command notification triggers identified?
- Are audit duties identified?
- Are repeated errors escalated?
- Are Supervisor findings connected to training or policy revision?

Findings:

Risk Indicators Identified:

- No risk identified
- Supervisor duties missing
- Review criteria unclear
- Documentation requirement missing
- Correction duty missing
- Escalation trigger missing
- Training referral missing
- No pattern detection requirement
- No link to policy revision
- Other:

Score:

0 1 2 3 4

Recommended Corrective Action:

Part VII: Digital Implementation Review

Review Question:

Does the digital policy system prove meaningful implementation or merely assignment, acknowledgment, and completion?

Review Prompts:

- Is the active policy version clear?
- Are archived versions preserved?
- Are material revisions identified?
- Are assignments version specific?
- Are training records linked to Directives?
- Are comprehension checks linked to Directives?
- Are Supervisor alerts used?
- Are remedial assignments tracked?
- Are overdue assignments escalated?
- Are warning signs linked to policy review workflows?
- Does the platform document implementation or completion only?

Findings:

Risk Indicators Identified:

- No risk identified
- Acknowledgment only
- Dashboard completion only
- Standards mapping without implementation proof
- No linked training
- No linked testing
- No Supervisor alerts
- No remedial assignment tracking
- No revision workflow after warning signs
- Version control unclear
- Other:

Score:

0 1 2 3 4

Recommended Corrective Action:

Part VIII: Corrective Feedback Review

Review Question:

Do warning signs trigger policy review, retraining, supervisory correction, discipline where appropriate, audit, or revision?

Review Prompts:

- Have complaints identified recurring issues?
- Have internal affairs findings identified recurring issues?
- Have use of force reviews identified recurring issues?
- Have pursuit reviews identified recurring issues?
- Have body worn camera audits identified recurring issues?
- Have report deficiencies identified recurring issues?
- Have lawsuits or claims identified recurring issues?
- Have suppression rulings identified recurring issues?
- Have legal updates required policy revision?
- Have training failures identified comprehension gaps?
- Did the agency revise, retrain, supervise, discipline, audit, or correct in response?

Findings:

Risk Indicators Identified:

- No risk identified
- Repeated complaints without policy review
- Repeated review deficiencies without retraining
- Audit findings without correction
- Legal changes without training
- Training failures without remediation
- Supervisor identified confusion without escalation
- No revision after warning signs
- No documented corrective feedback loop
- Other:

Score:

0 1 2 3 4

Recommended Corrective Action:

Part IX: Warning Sign Assessment

Known Warning Signs Present:

- Yes
- No
- Unknown

Warning Signs Identified:

- Complaints
- Lawsuits
- Claims
- Internal affairs findings
- Use of force review deficiencies
- Pursuit crashes or near misses
- Body worn camera audit failures
- Suppression rulings
- Training failures
- Documentation errors
- Supervisor identified confusion
- Legal updates
- Accreditation findings
- Digital noncompletion patterns
- Other:

Agency Response to Warning Signs:

- Policy revision
- Training
- Comprehension validation
- Supervisor briefing
- Remedial training
- Discipline where appropriate
- Audit
- Command review
- Digital workflow change
- No documented response
- Other:

Warning Sign Modifier Applied:

* Yes

* No

Explanation:

Part X: Interaction Effect Assessment

Interaction Effects Present:

* Yes

* No

Interaction Effects Identified:

* Fragmentation plus cognitive load

- Linguistic instability plus weak supervision
- Passive dissemination plus digital completion
- Warning signs plus no feedback loop
- Training simplification plus written policy mismatch
- Legal sufficiency plus poor operational usability
- Digital platform use plus no comprehension validation
- Other:

Interaction Modifier Applied:

- Yes
- No

Explanation:

Part XI: Aggregate Scoring

Policy Architecture Score:

Structural Fragmentation Score:

Linguistic Decision Signals Score:

Policy Cognitive Load Score:

Instructional Implementation Score:

Supervisory Control Score:

Digital Implementation Score:

Corrective Feedback Score:

Total Score:

Risk Band:

- 0 to 7 = Low System Risk
- 8 to 15 = Moderate System Risk
- 16 to 23 = Elevated System Risk
- 24 to 31 = High System Risk
- 32 = Critical Legacy System Risk

Adjusted Risk Band After Modifiers:

Part XII: Diagnostic Summary

Primary Risk Domains:

Secondary Risk Domains:

Most Serious Finding:

Most Important Evidence:

High Liability Decision Points Affected:

Policy Function Assessment:

- The cluster appears to function as a coherent legal decision system.
- The cluster functions with limited correctable weaknesses.
- The cluster contains moderate system weaknesses requiring corrective action.
- The cluster contains elevated system risk requiring priority modernization.
- The cluster contains high or critical legacy system risk requiring architectural replacement or command level corrective action.

Part XIII: Recommended Corrective Actions

Select all that apply:

- Architectural revision
- Cluster level integration
- Definition control
- Modal language revision
- Cognitive usability revision
- Reduction of unnecessary cross references
- Decision trigger clarification
- Training redesign
- Comprehension validation
- Scenario based application
- Supervisor duty revision
- Supervisor review form revision
- Digital platform reconfiguration
- Remedial training workflow
- Audit workflow
- Corrective feedback loop creation
- Policy revision after warning signs
- Architectural replacement
- Other:

Detailed Corrective Action Plan:

Responsible Function:

- Command Staff
- Policy Function
- Legal Advisor
- Accreditation Manager
- Training Function

- Supervisors
- Internal Affairs Function
- Digital Platform Administrator
- Risk Management
- Other:

Priority Level:

- Immediate
- 30 days
- 60 days
- 90 days
- Next scheduled policy cycle
- Other:

Part XIV: Final Cluster Review Statement

Based on the CCPFM review, the [policy cluster name] cluster received a total score of [score], placing it in the [risk band] category. The review identified primary risk in the following domains: [domains]. The available evidence indicates that the cluster [does or does not] function as a coherent, cognitively usable, training integrated, supervision connected, digitally supported, and feedback driven legal decision system. The most significant corrective need is [corrective category]. The recommended corrective action is [specific corrective action].